

**Braintree District Council**

**Core Strategy – Submission Draft**

**Sustainability Appraisal  
and  
Strategic Environmental Assessment**

**Environmental Report**

**April 2010**



The information contained in this document can be made available in alternative formats: large print, braille, audio tape or on disc.

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## Glossary of Acronyms

AQMA	Air Quality Management Area
AQRA	Air Quality Review and Assessment
CAMS	Catchment Abstraction Management Strategies
CO <sub>2</sub>	Carbon Dioxide
cSAC	Candidate Special Area for Conservation
DPD	Development Plan Document
EA	Environment Agency
EBAP	Essex Biodiversity Action Plan
EC	European Community
ECC	Essex County Council
EEC	European Economic Community
EHER	Essex Historic Environment Record
GCSE	General Certificate of Secondary Education
HGV	Heavy Goods Vehicle
HRA	Habitat Regulations Assessment
IMD	Index of Multiple Deprivations
KSI	Killed and Seriously Injured
LA	Local Authority
LDD	Local Development Document
LDF	Local Development Framework
LNR	Local Nature Reserve
LOWS	Local Wildlife Site
ODPM	Office of the Deputy Prime Minister
PAS	Planning Advisory Service
PAYE	Pay As You Earn
PDL	Previously Developed Land
PM <sub>10</sub>	Particulate Matter of less than 10 millionths of a metre
PPG	Planning Policy Guidance
PPS	Planning Policy Statement
PSA	Public Service Agreement
RSL	Registered Social Landlord
RSS	Regional Spatial Strategy
SA	Sustainability Appraisal
SA/SEA	Sustainability Appraisal incorporating the Strategic Environmental Assessment

SAC	Special Area for Conservation
SANGS	Suitable Accessible Natural Green Space
SCS	Sustainable Community Strategy
SEA	Strategic Environmental Assessment
SFRA	Strategic Flood Risk Assessment
SHLAA	Strategic Housing Land Availability Assessment
SHMA	Strategic Housing Market Assessments
SLA	Special landscape Area
SOC	Standard Occupational Classification
SPA	Special Protection area
SPD	Supplementary Planning Document
SSSI	Site of Special Scientific Interest
SUDS	Sustainable Drainage Systems
UKCIP	UK Climate Impacts Programme
VAT	Value Added Tax
WHO	World Health Organisation
WRMU	Water Resource Management Unit

# 1 INTRODUCTION AND METHODOLOGY

## 1.1 Background

In 2005 Essex County Council was commissioned by Braintree District Council to undertake the Sustainability Appraisal, incorporating the requirements of the Strategic Environmental Assessment Directive (SA/SEA), for Braintree District Council's Core Strategy. This report, the Environmental Report, sets out the SA/SEA undertaken for the Core Strategy. This Environmental Report draws together the findings of previous stages of the Core Strategy preparation and accompanying SA/SEA reports into one document.

For clarity, the SEA Directive requirements are outlined in a text box at the start of each section.

## 1.2 The Core Strategy

*SEA Directive requires: 'An outline of the contents and main objectives of the plan or programme, and of its relationship with other relevant plans and programmes.'* Annex I (a)

The Core Strategy is a Development Plan Document (DPD) forming part of the Local Development Framework (LDF). It sets out the spatial vision, spatial objectives and strategy for the development of the District. It should give a clear message about the ways in which the area will change by its end date providing a clear spatial expression of the relevant aspects of the Sustainable Community Strategy (SCS). The Core Strategy will cover the whole of the Braintree District and must be consistent with national policy and the East of England Plan. The plan should draw together policy strands at a district, town or neighbourhood level.

This Environmental Report relates to the Submission Draft version of the Core Strategy. Previous Stages of the Core Strategy preparation are outlined below:

### 1.2.1 Pre-production - Development of the Evidence Base

A number of preliminary workshops were held with local organisations and schools, and a 'Contact' questionnaire was delivered to every property in the District in October 2006. In addition to this, a number of studies were commissioned to help inform the Core Strategy. The results of both of these activities were used to inform the Issues and Options document.

### 1.2.2 Production - Preparation of Preferred Options, Regulation 25

The Issues and Options document built on the work carried out at the pre-production stage by setting out a series of options for the future of the area on which views were invited. Consultation was undertaken in respect of the document for a period of six weeks commencing in April 2007. An April 2007 SA/SEA Report was prepared in response to the Issues and Options Document.

### 1.2.3 'One District - One Vision' Document

The 'People and Places Consultation' on the 'One District - One Vision' - A Draft Strategy for People and Places in the Braintree District to 2025 document took place

from October 2008. The document combined the Council's Sustainable Community Strategy and Core Strategy. The document built on the Issues and Options Consultation that was held in 2007 and set out the Council's preferred locations for future development. An SA/SEA Report was prepared in response to the One District – One Vision Document.

### **1.3 Sustainability Appraisal and Strategic Environmental Assessment**

The European Directive 2001/42/EC “on the assessment of the effects of certain plans and programmes on the environment” (the ‘SEA Directive’) was adopted in June 2001 with a view to increase the level of protection for the environment, integrate environmental considerations into the preparation and adoption of plans and programmes and to promote sustainable development.

It requires a Strategic Environmental Assessment to be carried out for all plans and programmes which are:

*‘subject to preparation and/or adoption by an authority at national, regional or local level or which are prepared by an authority for adoption, through a legislative procedure by Parliament or Government, and required by legislative, regulatory or administrative provisions’.*

The few exceptions are detailed in Article 3 (8, 9) of the SEA Directive. The aim of the SEA is to identify potentially significant environmental effects created as a result of the implementation of the plan or programme on issues such as *‘biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors’* as specified in Annex 1(f) of the Directive. The Directive was transposed into English legislation by the Environmental Assessment of Plans and Programmes Regulations 2004, which came into force on 21 July 2004.

Sustainability Appraisals examine the effects of proposed plans and programmes in a wider context, taking into account economic, social and environmental considerations in order to promote sustainable development. They are mandatory for all Development Plan Documents and Regional Spatial Strategies in accordance with the Planning and Compulsory Purchase Act 2004 as amended.

Whilst the requirements to produce a Sustainability Appraisal and Strategic Environmental Assessment are distinct, Government guidance considers that it is possible to satisfy the two requirements through a single approach providing that the requirements of the SEA Directive are met.

### **1.4 Methodology**

The methodology adopted for the SA/SEA of the document seeks to meet the requirements for both SA and SEA and the environmental assessment of plans. It has been prepared in accordance with the following documents,

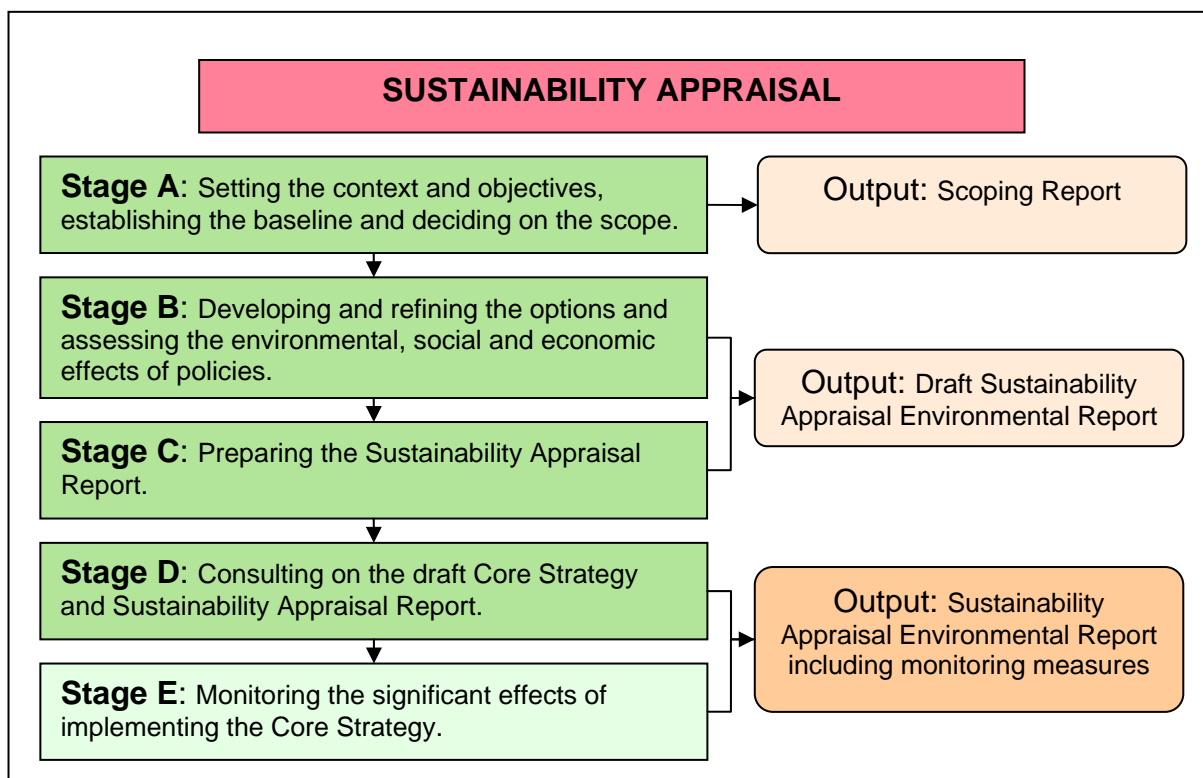
- The European Directive 2001/42/EC (EC, 2001)
- A Practical Guide to the Strategic Environmental Assessment Directive (ODPM, 2005)
- Sustainability Appraisal of Regional Spatial Strategies and Local Development Frameworks (ODPM, 2005)



- Local Development Frameworks – Guidance on Sustainability Appraisal (PAS, 2007)
- The Plan Making Manual (PAS online guidance available at: [www.pas.gov.uk](http://www.pas.gov.uk))

The appraisal of the document has been conducted in accordance with the guidance as part of a five stage process as outlined below.

**FIGURE 1: STAGES OF THE SUSTAINABILITY APPRAISAL AND OUTPUTS**



### 1.4.1 Scoping Report

Three Scoping Reports have been produced during the preparation of the Core Strategy. Subsequent Scoping Reports were prepared as the Document emerged taking into account emerging guidance and best practice. The Statutory Consultees were consulted for each Scoping Report, and their comments incorporated into the SA/SEA work as it progressed. Table 1 outlines the Scoping Reports produced and all are available to view on Braintree District Councils Core Strategy website pages:

**TABLE 1: SCOPING REPORTS**

Scoping Report	Reason for Update
July 2006	First Scoping Report produced.
February 2007	Updated to incorporate Statutory Consultees comments and more information on the proposed content of the Issues and Options Core Strategy was available at that stage.
November	Updated to incorporate Statutory Consultees comments. In addition the

2007	document proposed for the next stage of consultation was a combined Core Strategy and SCS, therefore the Scoping Report was updated to reflect this.
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Section 2 outlines the relevant Plans and Programmes, the Baseline Information and the Sustainability Objectives which were derived through the Scoping Reports for the Core Strategy.

## 1.5 The Aim and Structure of this Report

A combined Sustainability Assessment /Strategic Environmental Assessment (SA / SEA) has been undertaken on the ‘Submission Draft Core Strategy’ to assess and predict the economic, social and environmental effects that are likely to arise from its implementation. This is in accordance with the Planning and Compulsory Purchase Act 2004, the SEA Directive 2001/42/EC and Government guidance. The SA/SEA has been produced by the Spatial Planning Group of Essex County Council acting as consultants to Braintree District Council. The content of the report should not be interpreted or otherwise represented as the formal view of Essex County Council.

This report sets out the SA/SEA that has been undertaken for the consultation document. It highlights the key matters arising from the appraisal. Table 2 signposts the relevant sections of this report that represent the required content of an Environmental Report as outlined within the SEA Directive.

The purpose of undertaking the SA/SEA at this stage of the process is to identify potential significant sustainability effects arising from the content of the consultation document. The document will be subject to additional appraisal before adoption, to take account of proposals and amendments that may arise from the consultation and this appraisal.

**TABLE 2: THE ENVIRONMENTAL REPORT REQUIREMENTS**

SEA Regulations – required content of Environmental Report	Covered in this Report
An outline of the contents and main objectives of the plan or programme, and of its relationship with other relevant plans and programmes.	Section 1.2, 2.1 and 3 Annex A (Scoping Report)
The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.	Section 2.3 Annex B (Scoping Report)
The environmental characteristics of areas likely to be significantly affected.	Section 2.3 Annex B (Scoping Report)
Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Council Directive 79/409/EEC on the conservation of wild birds and the Habitats Directive.	Section 2.3 Annex B (Scoping Report)

<b>SEA Regulations – required content of Environmental Report</b>	<b>Covered in this Report</b>
The environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation.	Section 2.1 Annex A (Scoping Report)
The likely significant effects on the environment, including short, medium and long-term effects, permanent and temporary effects, positive and negative effects, and secondary, cumulative and synergistic effects, on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above issues.	Section 3, 4 & 5 Annex D & E
The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme.	Section 5
An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.	Section 3, 4 & 5 (Scoping Report)
A description of the measures envisaged concerning monitoring.	Section 6.2
A non-technical summary of the information provided under the above headings.	Non Technical Summary which precedes this Environmental Report

## 2 SUSTAINABILITY CONTEXT, BASELINE AND OBJECTIVES

### 2.1 Introduction

*SEA Directive requires: 'The environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation. Annex I (e)'*

The following section outlines the key findings of the Scoping Stage and published Scoping Reports which includes an outline of the plans and programmes, the baseline information profile for Braintree, together with the Sustainability Objectives formulated as a result of the Scoping Stage.

### 2.2 Plans and Programmes

Annex A details the full list of plans and programmes which were included within *Annex 2: Review of Plans and Programmes of the Strategic Environmental Assessment and Sustainability Appraisal of 'One District – One Vision' A Strategy for People and Places in Braintree District to 2025* published in November 2008.

Current best practice promotes a more selective approach regarding the collation of plans and programmes for the purpose of SA/SEA. In light of best practice those plans and programmes which have all been included within Annex A, have been reviewed and Table 3 outlines those viewed as being the 'key list of plans and programmes'. Those Plans and Programmes in bold being supported for inclusion by the Statutory Consultees in response to the Scoping Report consultations.

**TABLE 3: LIST OF PLANS AND PROGRAMMES**

<b>National</b>
<b>Strategic Environmental Assessment and Biodiversity: Guidance for Practitioners (June 2004)</b>
PPS23: Planning and Pollution Control – Annex 1: Pollution Control, Air and Water Quality (November 2004)
PPS23: Planning and Pollution Control (November 2004)
PPS1: Delivering Sustainable Development (February 2005)
PPS9: Biodiversity and Geological Conservation (August 2005)
PPS3: Housing (December 2006)
<b>Planning and Climate Change (Supplement to PPS1) (December 2007)</b>
<b>PPS25: Development and Flood Risk – Practice Guide (December 2009)</b>
PPS4: Planning for Sustainable Economic Growth (December 2009)
PPS25: Development and Flood Risk (March 2010)
PPS5: Planning for the Historic Environment (March 2010)

Regional
The East of England Plan, the Revision to the Regional Spatial Strategy for the East of England (RSS14) (May 2008)
Sustainable Futures – The Integrated Regional Strategy for the East of England (2005)
UKCIP Climate Change Scenarios (2002 and 2009)
Accommodation for Gypsies and Travellers and Travelling Showpeople in the East of England: A revision to the Regional Spatial Strategy for the East of England (March 2009)

County
The Essex Local Area Agreement 2008-2011 (April 2009 Refresh)
Essex Police Authority Three Year Strategy Plan 2009 – 2012
(draft) Essex School Organisational Plan 2009 – 2014
Essex Rural Strategy: Partnership Priorities for the future of Rural Essex (2005)
Essex Local Transport Plan 2006/2011
Essex Minerals Plan (1996)
Essex and Southend on Sea Waste Local Plan (2001)
Essex Biodiversity Action Plan (1999)
<b>Essex Biodiversity Action Plan Review (2006)</b>
Essex Wide Gypsy and Travellers Accommodation Needs Assessment (2006)

District
Braintree District Local Plan Review (adopted July 2005)
Mid Essex Economic Futures (March 2006)
North Essex Authority Retail Study Stage 1 Report and Stage 2 (2006)
Braintree, Brentwood, Chelmsford, Maldon and Uttlesford Landscape Character Assessment (2006)
Braintree Settlement Fringe Study (November 2007)
Non Residential Land Availability (March 2009)
Residential Land Availability (2007)
Braintree Strategic Housing Market Assessment (Feb 2008 + 2009 Update)

District
Urban Capacity Study (October 2007)
Employment Land Review (November 2007)
Braintree District, Haverhill and Clare Water Cycle Study (November 2008)
Strategic Housing Land Availability Assessment (SHLAA) (2009)
Habitat Regulations Appropriate Assessment (2009)
<b>Braintree Strategic Flood Risk Assessment (October 2007)</b>
Going for Growth, Investing in your future (June 2009)
Braintree District Futures 2025 (2006)
Rural Services Survey (2008)
Braintree Town Centre Preliminary Development Analysis Report (April 2009)
Assessment of Impact of Potential LDF Sites on Existing Junctions - Braintree and Witham LDF Allocations (2008)
Assessment of Impact of Potential LDF Sites on Existing Junctions - Braintree and Witham LDF Allocations (2010 draft)
Affordable Housing Provision and Developer Contributions in the District of Braintree (2009)
A Strategy for People and Places in the Braintree District to 2026 (2009)

## 2.3 Baseline Information

*SEA Directive requires: 'The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.'* Annex I (b)

*'The environmental characteristics of areas likely to be significantly affected.'* Annex I (c)

*'Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Council Directive 79/409/EEC on the conservation of wild birds and the Habitats Directive.'* Annex I (d)

Annex B details the complete Baseline Information profile for Braintree District, and is based on the information which was highlighted as relevant through the Scoping Reports, together with relevant new data sources which have become available since the consultation on the last Scoping Report.

The following section outlines the key baseline information for Braintree District, and outlines the current state of the environment.

### 2.3.1 Biodiversity

PPS9, together with the PPS9 companion guide support the inclusion of policy to support biodiversity and geodiversity through LDF documents. Advice recommends that the Core Strategy should embrace an integrated approach to biodiversity and geological conservation secured in two key ways.

- Firstly, development control policies and allocations relating to all sectors of land uses (housing, transport, etc.) should be consistent with the strategic objectives for biodiversity and geological conservation.
- Secondly, LDFs should promote a spatial planning approach to biodiversity and geological conservation and seek to bring together and integrate policies for development and other land uses with other policies and programmes which influence the nature of places and how they function.

There are no international biodiversity designations (Ramsar, SPAs, SACs or cSACs) in Braintree District. However a Habitat Regulations Assessment (HRA) has been undertaken for the Braintree Core Strategy on European Sites outside the Braintree District.

There are four SSSIs in Braintree District at: Belcher's and Broadfield Woods; Bovingdon Hall Woods; Chalkney Wood and Glemsford Pits. On average the condition of Braintree's SSSIs are better than the condition of SSSIs within the County as a whole. Belcher's and Broadfield Woods, together with Chalkney Wood are currently complying with the PSA target of 95% of all nationally important wildlife sites to be brought into a favourable condition by 2010. The majority of Glemsford Pits SSSI is not currently complying with the PSA target and therefore the condition of this site needs to be improved.

There are seven National Nature Reserves located in Essex; none of these are in Braintree District. Braintree District has a total of six Local Nature Reserves at: Bocking Blackwater; Brickfields / Long Meadow, Earls Colne; Brockwell Meadows, Kelvedon; Colne Valley (dismantled Railway); Cookoo Wood, Great Notley; Whetmead, Witham. There is a further LNR located on the border between Essex and Suffolk northern border at Rodbridge Picnic Site, Borlet, which is part of the Suffolk County Council LNR at Rodbridge.

There are 251 LoWSs scattered throughout Braintree District, with many concentrated in the centre of the district.

### 2.3.2 Landscape

PPS7 provides guidance on the inclusion of policies on the protection of locally and nationally designated landscapes and the safeguarding of soils within local planning documents.

The Government considers that conservation of the natural beauty of the landscape and countryside should be given weight in planning policies and development management decisions, in particular nationally designated sites such as National Parks and Areas of Outstanding Natural Beauty. Local designated sites should also be acknowledged but through criteria based policies using Landscape Character Assessments as a tool.

PPS7 also recognises the importance of agriculture with regards to the landscape and countryside and encourages local planning authorities to include policies in their

local development documents that protect specific areas of best and most versatile agricultural land from speculative development.

The majority of agricultural land in Braintree District is classified as Grades 2 and 3, with 65.8% (40,243 hectares) of agricultural land classified as Grade 2 and 29.9% (18,304 hectares) as Grade 3. Strips of Grade 3 soils follow the path of the rivers Brian, Ter, Blackwater and Colne as they flow through the district.

Special Landscape Areas (SLAs) located within the district have been identified on the Proposals Map of the Braintree District Local Plan Review 2005. These have been implemented to protect the visual quality of important areas. The major SLA is 'North Essex', which incorporates much of the district. However there are some smaller SLAs within the district

Braintree is subject to two Landscape Character Assessments; The Essex Landscape Character Assessment (2003) and the Combined Landscape Character Assessment (2006). The information contained within these can be used to determine the sensitivity of certain landscape area to development.

### **2.3.3 Air Quality and Noise**

PPS23 and the accompanying Annex 1 provides guidance for local planning authorities on how to control air pollution by preventing harmful development and mitigating against the impacts of potentially polluting developments over the medium to long term. Local Authorities have a responsibility to work towards meeting the national air quality objectives within their area and local development plans should set out the criteria against which applications for potentially polluting developments will be considered.

PP24 addresses how the planning system can help minimise the adverse impact of noise from development. It advises that local development plans should give developers and local communities a degree of certainty about the areas in which particular types of development will be acceptable and those in which special measures may be required in order to mitigate the impact of noise.

Air Quality in Essex is generally good. There are no AQMAs located in Braintree District. The main air quality issues in the district were found to be nitrogen dioxide and particulate emissions from vehicles travelling on the A12 and A120.

It should be noted that there are currently 5 potentially significant junctions which were identified as a result of the implementation of Air Quality Review and Assessment (AQRA) requirements by the Environment Health Department of Braintree District Council. These 5 junctions each had a daily flow of more than 10,000 vehicles in 2004 and are as follows Newland Street, Witham; Cressing road, Witham; Head Street, Halstead; Railway Street, Braintree; and Rayne Road, Braintree.

Of the 11 passive diffusion NO<sub>2</sub> monitoring tubes located in the district, only one of these has shown any indication of WHO NO<sub>2</sub> objective exceedence between 2002 and 2008. This tube is located by the A12 in Hatfield Peverel.

All major roads in Essex experienced some noise levels of over 75dB(A) in the day (Lden map), in particular the A12, A127, M11 and the M25, and where this was not the case the measurements were mainly between 65 and 70dB(A). In the night (Lnight map) there are lower level of ambient noise along all the major roads than the Lden map.



### 2.3.4 Climatic Factors

The supplement to PPS1 stipulates that the core strategy should be informed by, and in turn inform, local strategies on climate change including the sustainable community strategy. The local development documents should follow the key planning objectives which are to prepare, and manage the delivery of, spatial strategies that:

- make a full contribution to delivering the Government's Climate Change Programme and energy policies, and in doing so contribute to global sustainability;
- in providing for the homes, jobs, services and infrastructure needed by communities, and in renewing and shaping the places where they live and work, secure the highest viable resource and energy efficiency and reduction in emissions;
- deliver patterns of urban growth and sustainable rural developments that help secure the fullest possible use of sustainable transport for moving freight, public transport, cycling and walking; and, which overall, reduce the need to travel, especially by car;
- secure new development and shape places that minimise vulnerability, and provide resilience, to climate change; and in ways that are consistent with social cohesion and inclusion;
- conserve and enhance biodiversity, recognising that the distribution of habitats and species will be affected by climate change;
- reflect the development needs and interests of communities and enable them to contribute effectively to tackling climate change; and
- respond to the concerns of business and encourage competitiveness and technological innovation in mitigating and adapting to climate change.

Key findings for the East of England for the 2080s based on medium (current) emissions scenarios are for an increase in winter mean temperature of approximately 3°C and an increase in summer mean temperature of approximately 3.6°C. The central estimate of change in winter mean precipitation is 20%; whilst the central estimate of change in summer mean precipitation is –20%.

Braintree achieved a 5.41% per capita reduction in CO<sub>2</sub> emissions between 2005 and 2007 which was greater than the Essex average of 4.35%. In 2006 Braintree consumed more energy in total than the Essex average. 38.10% of the energy consumption was for transport, closely followed by 36.70% was consumed by the domestic sector. The industrial and commercial sector consumed marginally less proportionally than the Essex average for this sector.

### 2.3.5 Water Quality

PPS23 and the accompanying Annex 1 provides guidance for local planning authorities on how to control pollution by preventing harmful development and mitigating against the impacts of potentially polluting developments over the medium to long term. It states that Local Planning Authorities should take into account the implications of land use changes and development on water quality with regards to the ecological criteria in the Water Framework Directive. When preparing Local Development Documents the Local Planning Authority must also consider River Basin Management Plans.

The main water courses running through Braintree District are the rivers Blackwater, Colne, Brain, Pant, Stour and Ter. Braintree contains Source Protection Zones and major aquifers within the northern half of the district, together with scattered minor aquifers in the south of the district.

Following a national review of CAMS boundaries, water resources in the South Essex CAMS (excluding the Mardyke catchment) are now incorporated with the North Essex CAMS into the Combined Essex CAMS. The Combined Essex CAMS document sets out the issues for the whole of Essex. The document splits the county into Water Resource Management Units (WRMU), of which 2 relate to areas which include watercourses within Braintree District. There are WRMU1 and WRMU2.

The integrated WRMU status for WRMU 1 was 'over-abstracted' and for WRMU 2 it was 'no water available' at February 2007. The Combined Essex CAMs Annual Update (March 2008) noted that the availability of water within the Roman River / Layer Brook catchment had changed, however the water availability and restrictions for the remainder of WRMU 1 have not changed since the publication of the CAMS in February 2007.

Essex falls within the Anglian River Basin District. The Anglian River Basin District is subdivided into catchment areas and the Essex Rivers catchment area lies within the counties of Essex and Suffolk as well as a small part of Cambridgeshire.

The Combined Essex catchment area is further subdivided into water body catchment areas. The water bodies which are associated with Braintree District are: R1, Doomsey Brook; R4, Ter; R16, River Chelmer; R23, Blackwater Pant; R91, Brain, R102, Boreham Tributary; and R115, River Blackwater.

The majority of water bodies within Braintree are given a 'moderate' current overall potential. However the River Blackwater and the River Chelmer are both given a 'poor' current status.

### **2.3.6 Flooding**

PPS25 requires developments to be carried out in areas of as low a risk of flooding as possible. It states that all Local Planning Authorities should prepare Local Development Documents that set out policies for the allocation of sites and the control of development which avoid flood risk to people and property where possible and manage it elsewhere, reflecting the approach to managing flood risk in this PPS and in the Regional Spatial Strategy for their region.

The areas which are most susceptible to flooding are mainly located next to the major waterways within Braintree District: the Blackwater, Stour and Colne.

Between April 2008 and March 2009 of the eleven applications which received an objection from the Environment Agency, seven were subsequently withdrawn. One application (08/00024/FUL) was refused on the grounds of flood risk on site. Three applications which received an objection from the Environment Agency were supplemented by the submission of additional material which removed the EA objection, and these applications were subsequently granted.

The Mid Essex Strategic Flood Risk Assessment which includes Braintree District was published in October 2007. . Area specific strategies identified within the SFRA are outlined below.

Flood Risk

- Consideration to flooding from overland flow should be given for developments occurring throughout the District, but with particular regard to Bocking, Braintree, Witham and Coggeshall.

#### Sustainable Drainage Systems (SuDS)

- Runoff rates should be restricted for both greenfield and brownfield developments in Bocking, Braintree, Witham and Coggeshall in particular, this is also likely to be appropriate within other settlements to ease surface water flooding and drainage capacity exceedence;
- Infiltration techniques are unlikely to be appropriate where the site is underlain by London Clay, such as in Bocking, Braintree, Witham, Halstead, Coggeshall and Kelvedon. Attenuation techniques should be imposed in these circumstances.

#### Water Environment

- There is a need for sensitivity near watercourses stating development would not be permitted that would harm the open character, nature conservation importance or recreational importance of the floodplains of the River Stour, Colne, Brain, Pent, Blackwater, Ter Valley and their tributaries and the Chelmer and Blackwater Navigation.
- Where appropriate, development proposals adjoining the rivers will be required to incorporate riverside paths and open spaces.
- Any proposals requiring the provision of a new bridge shall ensure a minimum of 2.3 metres headroom above normal water level to allow for river use and provide fauna passages suitable as wildlife corridors.

### **2.3.7 Cultural Heritage and Townscape**

PPS5 states that local development frameworks should set out clearly the Local Planning Authority's policies for the conservation and enjoyment of the historic environment in their area.

There are 3,190 listed buildings within Braintree District, the majority of which (2,939) are Grade II followed by 181 Grade II\* and 66 Grade I listed. The distribution of listed buildings within the district is fairly widely spread. Clusters of listed buildings can be found in the historic settlements such as Coggeshall and linear patterns are identifiable along historic transport routes. In 2009 there were 21 listed buildings on the 'at risk' register which is a decrease from previous year totals of 23 in 2008 and 27 in 2007.

The Essex Historic Environment Record (EHER) contains approximately 3,252 archaeological records relating to Braintree District out of a total of 21,298 for the county. There are 40 Scheduled Monuments within the district. There are 215 designated Conservation Areas within the county of Essex, 39 of which are within Braintree District.

### **2.3.8 Health**

In PPS1 the Government promotes sustainable development and with regard to health the document stipulates that development plans should:

- address accessibility (both in terms of location and physical access) for all members of the community to jobs, health, housing, education, shops, leisure and community facilities;
- deliver safe, healthy and attractive places to live; and,
- support the promotion of health and well being by making provision for physical activity.

The health of the population in Braintree is generally better than the England average. However, road injuries and deaths, physical activity and obesity in adults are worse than average.

The average life expectancy from birth for males and females in Braintree is 78.93 and 82.76 years of age respectively. These are similar to the equivalent life expectancies for the East of England and slightly below those for Essex. Although none of the localities in Braintree falls into the most deprived fifths in England, there are still health inequalities within Braintree by location, gender, deprivation and ethnicity. Men in the most affluent areas can expect to live about 5 years longer than in the more deprived areas. There is no difference in the life expectancy of Braintree's women apart from those in the most affluent group, who live on average about 2 years longer than the rest.

Over the past 10 years, all age, all cause mortality has closely tracked the England trend. Early death rates from heart disease and stroke are not improving as fast as in England and are now close to the national rate.

Children in Braintree used to be significantly less obese than the average but are not so anymore. 17.2% of year 6 pupils in 2008/09 were recorded as being obese. 25.72% of over 16s were recorded as obese in the latest published data.

Braintree has the 2<sup>nd</sup> lowest rate of sports participation in the county, which at 13.0% is also lower than the national and regional levels of 16.6% and 15.8% respectively, however 70.2% of people in the district are either satisfied or very satisfied with their local sports provision.

As of 2008, Braintree was on target to reduce all KSI casualties by 40% of the baseline figure by 2010.

### **2.3.9 Population and Social**

PPS1 promotes the creation of sustainable communities and promote community cohesion. It stipulates that development plans should:

- ensure that the impact of development on the social fabric of communities is considered and taken into account;
- seek to reduce social inequalities;
- address accessibility (both in terms of location and physical access) for all members of the community to jobs, health, housing, education, shops, leisure and community facilities;
- take into account the needs of all the community, including particular requirements relating to age, sex, ethnic background, religion, disability or income;
- deliver safe, healthy and attractive places to live; and,
- support the promotion of health and well being by making provision for physical activity.

As of 2008 the estimated population for the district of Braintree was 142,100 which accounts for 10% of the county's estimated population. Braintree District has experienced a higher population growth at than the county, the region and England as a whole. In 2008, the largest proportion of the population in Braintree District was aged 45-65 (males) and 45-59 (females) with the second largest age category including those persons aged 30-44.

The projected population is predicted to increase annually within the district by 19.5% to 173,600 in 2026, above the projected growth for Essex, the East of England and England. Beyond 2026 the population is projected to increase by an additional 4.0% to 180,800 in 2031. In Braintree District the household projection for 2026 is 79,000 which is an additional 20,000 households on the 2006 representing an increase of 25.3%. Beyond 2026 to 2031 a further 4,000 households are projected.

In 2007, Braintree was ranked as the 239th out of the 354 local authorities in England (1 being most deprived) putting it in the 40% least deprived districts nationally. Braintree has a low level of deprivation in the rankings of extent and local concentration compared to other local authorities in England. However, it is in the bottom 50 percent of most deprived local authorities in the ranking of income scale and only just in the top 50 percent for employment scale. In Braintree District 26% of the small areas are seriously deprived with regards to 'Barriers to housing and services', and 17% are seriously deprived with regards to 'Education, skills and training'. Braintree District is one of six local authorities in Essex that does not have any small areas (Lower Super Output Areas) reported as falling in the 20% most deprived areas nationally in the IMD. It also doesn't have any areas classed as seriously deprived for 'Living Environments', 'Health and disability' and 'Crime'.

In 2009, 62.4% of pupils in Braintree District achieved 5 or more A\* to C GCSE grades or equivalent which is an improvement to 1997 figures but lower than the county, regional and national levels. The proportion of working age people in Braintree District qualified to at least a level 2 has increased between 2000/01 and 2007/08 to a total of 64.8%, however this figure is below the county, regional and national levels. The proportion of working age people in Braintree District qualified to at least a level 4 follows the same trend as those qualified to at least a level 2.

The total number of claimants within Braintree has continuously increased since February 2002 from 7,570 to the most recent figure of 10,440 recorded in February 2009. The period of largest increase occurred between February 2008 and 2009 when the number of residents claiming job seekers allowance more than doubled to 2,920. Previous to this, the number of residents claiming job seekers allowance was gradually declining. The increase in the number of job seeker claimants corresponds with the increased level of unemployment for residents of Great Britain, the East of England region as well as Braintree District. The most recent figures show that Braintree has a higher level of unemployment than the region as a whole. Average gross weekly pay for people residing in Braintree District stood at £519.50 in 2009. This is £10.10 above that received by workers in the East of England and £28.50 above that seen in Great Britain as a whole.

### **2.3.10 Economy**

The newly adopted PPS4 supports the inclusion of policies within Local Development Framework documents which support sustainable economic development. It states that Local Development Documents should:

- set out a clear economic vision and strategy for their area;

- support existing business sectors;
- positively plan for the location, promotion and expansion of clusters or networks of knowledge driven or high technology industries;
- seek to make the most efficient and effective use of land;
- identify, protect and promote key distribution networks;
- plan for the delivery of the sustainable transport and other infrastructure needed to support their planned economic development;
- where necessary, safeguard land from other uses;
- encourage new uses for vacant or derelict buildings, including historic buildings;
- consider how sites for different business types can be delivered.

There are 6,965 local units within Braintree District which are equally split into the urban and rural areas. Nationally, the split is more pronounced with 74.6% of all VAT and/or PAYE based local units located in urban areas and only 25.4% in the rural areas. Braintree District has the highest proportion of local businesses employing 0-4 persons at 72.1% compared to the regional and national equivalents; and fewer large employment sized businesses (20 or more person) at 6.9%.

In 2009, Braintree District had a higher proportion of businesses in 'Agriculture, Retail and Fishing', 'Production', and 'Construction' compared to the region and nation figures. The largest number of business in the district was within the 'Construction' group at 1,135 which represented 16.3% of the total number of businesses. The smallest proportion of local units was recorded within the 'Public Administration and Defence' group.

The floorspace allocated to factories in the district, at 43.4%, is above that found in the East of England (32.9%) and England (34.2%). The largest relative under-representation within the district can be found within the amount of commercial and industrial floorspace being utilised by commercial offices in the district, which is below that in the East of England and nearly half of that found in England. The district also has the smallest proportion of retail and non-commercial office floorspace across the three hierarchies.

At £38 per m<sup>2</sup>, rateable values for factory floorspace are higher in the district than at any other hierarchy. This is the only bulk industry class which can claim a higher rateable value per m<sup>2</sup> than both the East of England and England. Offices and Commercial offices show the largest deviation from the regional and national picture. At £86, the rateable value of commercial offices per m<sup>2</sup> is £42 below the national level.

In 2009, there were 9 employment sites in Braintree District. The largest employment site was in Braintree East Ward located at Braintree Freeport Village and covering a site of 1.81 hectare site.

Braintree District can be seen to have an above average proportion of people employed in the 'Manufacturing' and 'Construction' sectors and a deficit compared to regional and national figures in 'Services'. The general proportion of full-time to part time jobs, at approximately 2:1, is in line with regional and national averages. Managers and senior officials is the SOC group which has the highest proportion of workers at all three geographical areas followed by Associate professional and technical. In Braintree the proportion of workers in these two groups are similar with 16.9% in managers and senior officials and 16.4% in associate professional and technicals. The SOC groups within Braintree that show the most deviation from the

regional and national pictures are that of 'process plant and machine operatives' which at 11.4% is significantly higher, and 'Professional occupations' which has a much smaller proportion than the region and nationally.

There is a clear disparity between these gross weekly wages with those living in the district earning, on average, more than those who work there. The differences suggest that there is out commuting to work in higher paid jobs than those available within the district.

### **2.3.11 Housing**

PPS3 states that Local Planning Authorities should plan for housing over a period of at least 15 years. The PPS provides guidance on the inclusion of policies for housing which contribute to the achievement of sustainable development with regards to high quality housing, location, mix, and housing levels.

In 2008/2009 there were 342 net additional dwellings (taking into account losses/demolitions) within the district. This is the lowest value within the time period studied and less than half of the dwelling completions recorded in 2004/2005.

The Regional Spatial Strategy (RSS) for the East of England has set a minimum target of 7,700 additional dwellings to be built between April 2001 and March 2021 within Braintree District. As of 2008/2009 4,988 net additional dwellings had been built which accounts for 64.8% of the RSS target. This leaves a further 2,712 dwellings to be built by 2021 at a rate of 226 per year.

The number of gross dwelling completions on previously developed land (PDL) within Braintree District has fluctuated since 2001/2002. The most recent period, 2008/2009 recorded the third lowest number of dwellings completed on PDL at 322 units. However, when considered proportionately to the total number of dwelling completions per year, the 322 dwellings completed on PDL in 2008/2009 accounted for 77.60% which is the highest proportion across the study period.

#### ***Affordability***

The number of net affordable dwelling completions has experienced variations since 2004/2005. The lowest annual number of affordable dwelling completions was in 2008/2009 with 68 units, which equated to 19.9% of completions, while the highest number of 188 units was completed in 2006/2007 and accounted for 28.57% of the total number of net dwelling completions.

All geographical areas have shown a similar fluctuating trend with mean dwelling prices experiencing a general increase up to the third quarter of 2008. After this date dwelling prices sharply decreased into the first quarter of 2009 before recovering to levels similar to the end of 2008. The time series indicates that dwelling prices in Braintree decreased more significantly than the county, regional and national dwelling prices during this period and although they have begun to increase the mean dwelling price remains below those of the other areas. Provisional figures for mean dwelling prices in the third quarter of 2009 show that dwelling prices in Braintree District are comparatively lower than the county, region and national equivalents. The mean dwelling price in Braintree District is £206,673. The mean dwelling price in Braintree has remained below the county average since at least 2001.

### ***Dwelling Stock***

Braintree District had a provisional dwelling stock during 2008/09 of 60,412 which represented 10% of the county's total dwelling stock. The tenure with largest proportion of dwelling stock across all geographical areas was within the private sector, which includes dwellings that are owner occupied and privately rented. In Braintree this accounted for 79.48% of the total dwelling stock in 2008/09.

The proportions of stock owned by the Local Authority (LA) and Registered Social Landlord (RSL) in the district did not follow the same trend shown at county, regional and national levels. In Braintree there was only 0.10% of LA dwelling stock which was significantly smaller than the proportions of LA dwellings at county, regional and national levels of 7.57%, 6.60% and 8.06% respectively. In contrast, there were a higher proportion of Registered Social Landlords (RSL) dwellings in the district of 20.39% compared to 7.13% in Essex, 9.16% in East of England and 9.73% in England.

The annual number of property sales between 2001 and 2008 has fluctuated for all geographical areas, showing a similar pattern with peaks in 2004 and 2006. After 2006 the number of property sales declined, with a significant decrease occurring between 2007 and 2008. In Braintree District this accounted for 1,860 fewer sales with only 1,696 property sales taking place in 2008.

The number of statutory homeless peaked in the East of England at 16,700 and in England at 213,290 in 2005/06 and since then the numbers have declined annually to 5,050 and 53,430 in 2008/09 respectively. For England this represents a 75% reduction over a four year period. The highest level of homeless acceptances in priority need in Braintree occurred in 2003/2004 with 390 people. Since 2003/04 there has been an overall decrease in the number of homeless acceptances and the most recent level of 195, recorded in 2008/09, is the lowest figure across the study period. In 2008/09 Braintree District recorded the joint third highest number of homeless acceptances in priority need within Essex.

### ***Gypsy and Traveller Sites***

In July 2009 there was a total of 50 caravans sited within the district, of which 37 were located on authorised sites and 11 on unauthorised sites. All caravans on unauthorised sites were situated on land owned by gypsies and only one caravan was tolerated. Of the 37 caravans on authorised sites, 7 were private while the remaining 30 caravans were socially rented.

The total number of caravans in Braintree represents only 5% of the total amount within the county and only 1% of those within the East of England region. Essex and the East of England counted the largest proportions of caravans as privately owned within authorised sites while in the district there was a larger proportion of caravans counted as socially rented within authorised sites.

There are two authorised Gypsy sites that are managed by Essex County Council in Braintree District at Cressing and Ridgewell. In January 2009 neither had exceeded their individual caravan capacities of 24. All 13 pitches at Cressing and 12 pitches at Ridgewell are residential.

## **2.3.12 Transport**

PPG13 advises that during the preparation of development plans, local authorities should:



- accommodate housing principally within existing urban areas, planning for increased intensity of development for both housing and other uses at locations which are highly accessible by public transport, walking and cycling;
- ensure that development comprising jobs, shopping, leisure and services offers a realistic choice of access by public transport, walking, and cycling, recognising that this may be less achievable in some rural areas;
- in rural areas, locate most development for housing, jobs, shopping, leisure and services in local service centres which are designated in the development plan to act as focal points for housing, transport and other services, and encourage better transport provision in the countryside;
- ensure that strategies in the development and local transport plan complement each other and that consideration of development plan allocations and local transport investment and priorities are closely linked;
- use parking policies, alongside other planning and transport measures, to promote sustainable transport choices and reduce reliance on the car for work and other journeys;
- give priority to people over ease of traffic movement and plan to provide more road space to pedestrians, cyclists and public transport in town centres, local neighbourhoods and other areas with a mixture of land uses;
- ensure that the needs of disabled people as pedestrians, public transport users and motorists - are taken into account in the implementation of planning policies and traffic management schemes, and in the design of individual developments; consider how best to reduce crime and the fear of crime, and seek by the design and layout of developments and areas, to secure community safety and road safety; and
- protect sites and routes which could be critical in developing infrastructure to widen transport choices for both passenger and freight movements.

With regard to vehicle ownership, ownership of a single car or van per household is the most common occurrence with 41.74% of households within Braintree falling within this category and lower than the County or National proportions.

Proportionately fewer households in Braintree did not own a car or van compared to the county and national figures. In contrast, a greater proportion of households in the district owned two or more cars or vans.

Tackling congestion is one of the five objectives set in the Local Transport Plan by Essex County Council who are the Highways Authority for the area. In 2006/07 there were two sections of road within the boundary of Braintree District that recorded high levels of congestion. These were between junctions 20a to 21 on the A12 through Hatfield Peverel to Witham and between junctions 22 to 24 on the A12 from the west of Witham to the west of Kelvedon.

The mainline railway network that operates through Braintree District, into London, is National Express East Anglia with stations located at Braintree, Braintree Freeport, Cressing, White Notley, Witham and Hatfield Peverel. Between 2006/07 and 2007/08 the network recorded an increase in passenger journeys of 5.6%. It is important to note that this figures is for the entire railway network within and outside Essex.

More than 40% of residents of Braintree drive a car or van to get to work; this is higher than the regional and national figures. Larger proportions of Braintree's population commute as a passenger in a car or van, by train or on foot than at

regional and national levels while fewer Braintree residents cycle or use buses, minibuses or coaches compared to regional and national levels. A comparatively larger proportion of residents of Braintree work mainly at or from home than both the regional and national proportions.

There are areas in the north of Braintree District which are less accessible to employment and retail centres and secondary schools with travel times to these services above 90 minutes by public transport or walking. Accessibility by public transport or walking to key services and educational facilities is improved considerably within and in close proximity to the town of Braintree, Halstead and Witham. Over four fifths of the population of Braintree District live within 30 minutes of each of the 5 highlighted services. Over four fifths of the population of Braintree District live within 15 minutes access of a primary school. This proportion drops when accessibility to the remaining four services are analysed. With respect to secondary schools, just 42% of residents live within 15 minutes access time.

## 2.4 Sustainability Objectives

The sustainability objectives have been derived from the review of plans and programmes and a strategic analysis of the baseline information. Objectives are based on policy advice and guidance and related to the assessment of the current state of the District. The appraisal is then able to evaluate, in a clear and consistent manner, the nature and degree of impact and whether significant effects are likely to emerge from the plan's proposed policies. Table 4 outlines the stages which led to the formulation of the Sustainability Objectives, which were based on the key issues for the district.

**TABLE 4: KEY ISSUES FOR BRAINTREE CORE STRATEGY**

Plans and Programmes	Baseline Information	Sustainability Objective
PPS 1 – Delivering Sustainable Development (2005) ODPM	Braintree has an ageing population. It is ranked within the 40% least deprived nationally.	1) Create Safe Environments which do not undermine the quality of life or community cohesion
PPS 3 – Housing (2006) ODPM	In 2008/09 there were the lowest number of net additional dwellings completed within the time period studied. Dwelling prices are lower than the county, regional and national equivalents, and mean dwelling price has remained below the county average since 2001.  Social housing within the district is provided predominantly by RSLs rather than by the Local Authority.  In 2008/09 the district recorded the joint third highest number of homeless acceptances in priority need within Essex.	2) To provide everyone with the opportunity to live in a decent home

Plans and Programmes	Baseline Information	Sustainability Objective
PPS 1 – Delivering Sustainable Development (2005) ODPM	The health of the population in Braintree is generally better than the England average; however road injuries and deaths, together with physical activity and obesity are worse than average.	3) To improve the health of the Districts residents and mitigate/reduce potential health inequalities.
PPS 4 – Planning for Sustainable Economic Growth (2009) CLG	The district has the smallest proportion of retail and non-commercial office floorspace at county, regional and national levels.	4) To promote town centre vitality and viability
<p>PPS 1 – Delivering Sustainable Development (2005) ODPM</p> <p>PPS4 – Planning for Sustainable Economic Growth (2009) CLG</p>	<p>Braintree has a fairly even split of VAT and/or PAYE based local units located in rural and urban areas, as opposed to the national picture where almost 75% of these are located within the latter. The district also has a higher than average proportion of businesses employing 0-4 persons. The largest numbers of businesses within the district are within the construction sector, which employs an above average proportion of people. Process plant and machine operatives are employed within the district at levels above the regional and national averages.</p> <p>There are recorded levels of outcommuting to work in higher paid jobs than those available within the district. Braintree has a higher level of unemployment than the county as a whole, and from February 2008 to 2009 the number of residents claiming job seekers allowance nearly doubled. For those in work weekly wages are above the regional and national levels.</p>	5) To achieve sustainable levels of prosperity and economic growth
PPS 9 – Biological and Geological Conservation (2005) ODPM	<p>There are four SSSIs within the district, the majority of Glemsford Pits SSSI is not currently complying with PSA targets.</p> <p>There are six Local Nature Reserves and 251 Local Wildlife Sites distributed across the district.</p>	6) To conserve and enhance the biological and geological diversity of the environment

Plans and Programmes	Baseline Information	Sustainability Objective
PPG 13 - Transport (2001) ODPM	Braintree has above average car ownership, with above average numbers of households owning two vehicles or more. In accordance with this over 40% of residents drive to get to work, while fewer residents than the national and regional average cycle or use buses for their commute. A comparatively large proportion of residents in the district work from home.	7) To promote more sustainable transport choices.
PPS 1 – Delivering Sustainable Development (2005) ODPM	Areas in the north of Braintree are over 90 minutes by public transport or walking to employment and retail centres and secondary schools.	8) Promote accessibility.
Braintree District Council – Community Strategy (A Strategy for People and Places in the Braintree District to 2026)	GCSE attainment is lower than regional and national levels.	9) To improve the education and skills of the population
PPS 5 – Planning for the Historic Environment (March 2010) CLG	<p>There are 3,190 listed buildings, 2939 of which are Grade II.</p> <p>There are 40 Scheduled Monuments, and 39 Conservation Areas.</p> <p>Essex Historic Environment Record contains approximately 3,252 archaeological records relating to Braintree.</p>	10) To maintain and enhance cultural heritage and assets within Braintree
Planning Policy Statement: Planning and Climate Change - Supplement to PPS 1 (December 2007) CLG	<p>Scenarios suggest there will be warmer wetter winters, and warmer drier summers in the East of England.</p> <p>Braintree has been consuming more energy in total than the Essex average, but achieved a per capita reduction in CO2 emissions. The majority of energy is consumed by the transport sector, closely followed by the domestic sector.</p>	11) To reduce contributions to climatic change
PPS 23 – Planning and Pollution Control and Annex 1. (2004) ODPM	<p>Water Resource Management Units in Braintree are over-abstracted or classified as having no water available.</p> <p>The majority of water bodies within Braintree are given a moderate overall potential. However the River Blackwater and the River Chelmer are both given a poor current status.</p>	12) To improve water quality

Plans and Programmes	Baseline Information	Sustainability Objective
PPS 25 – Development and Flood Risk (March 2010) CLG	Consideration to flooding from overland flow should be given for developments occurring throughout the district, but with particular regard to Bocking, Braintree, Witham and Coggleshall.	13) To reduce the risk of flooding
PPS 23 – Planning and Pollution Control and Annex 1 (2004) ODPM	Air and Noise quality issues all related to the major road network within the district.	14) To improve air quality
Sustainable Futures: Integrated Sustainability Framework for the East of England (January 2009)	<p>In 2008/09 over 77% of completions were on PDL.</p> <p>The majority of agricultural land in Braintree is Grades 2 and 3.</p> <p>The district contains Special Landscape Areas and was subject to Landscape Character Assessments</p>	15) To maintain and enhance the quality of landscapes and townscapes

Annex C which accompanies this Environmental Report sets out how these Sustainability Objectives are incorporated into a Sustainability Framework. A Sustainability Framework is an important tool in the SA/SEA process that is developed during the scoping phase in line with the Planning Advisory Service’s best practice guidance for Sustainability Appraisals. It provides the context against which the emerging Core Strategy options and policies can be assessed and sets out the sustainability objectives; the key questions that should be asked to decipher whether the Strategy adheres to the principles of sustainability; and indicators which can monitor the impact of the Strategy.

The Sustainability Framework was first included in the Scoping Report which was submitted to the three statutory consultees, the Environment Agency, English Heritage and Natural England for consultation. The comments and recommendations received have been incorporated within the Sustainability Framework.

### 3 APPRAISAL OF PLAN AIMS AND OBJECTIVES

#### 3.1 Introduction

*SEA Directive requires: 'The likely significant effects on the environment, including short, medium and long-term effects, permanent and temporary effects, positive and negative effects, and secondary, cumulative and synergistic effects, on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above issues.' Annex I (f)*

*'The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme. Annex I (g)'*

*SEA Directive requires: 'An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.' Annex I (h)*

This section sets out the appraisal of the Core Strategy Aims and Objectives as outlined within the Submission Draft document.

Where the Core Strategy Aims and Objectives have been compared against the SA/SEA Sustainability Objectives for compatibility the following key has been used to illustrate their compatibility:

+	Where the objectives are compatible
/	Where it is uncertain the objectives are related
0	Where the objectives are not related
-	Where the objectives are potentially incompatible

#### 3.2 Core Strategy Aims

Section 3 of the Submission Draft Core Strategy contains the aims of the Core Strategy which reflect those of the Sustainable Community Strategy. The four aims are as follows:

- 1. Promoting accessibility for all
- 2. Creating a clean and green environment and addressing climate change
- 3. Achieving a prosperous local economy
- 4. Enabling everyone to enjoy a safe and healthy lifestyle

Table 5 outlines the results of the review of the compatibility of the Core Strategy Aims and Sustainability Objectives.

In terms of compatibility, the Sustainability Objective relating to Cultural Heritage is not highlighted as being either compatible or incompatible with any of the Core Strategy Aims.

There are a number of uncertainties relating to the Core Strategy Aims and the Sustainability Objectives.

- Promoting accessibility for all has uncertain compatibility with Biological and Geological diversity (SO6), contributions to climate change (SO11) and Air Quality (SO14) where the promotion of accessibility could potentially be to the detriment of these objectives through increased transportation.
- Creating a clean and green environment and addressing climate change has uncertain compatibility with Economic Growth (SO5) and Town Centres (SO4) where incompatible businesses may be negatively impacted. Landscapes and Townscapes (SO15) may also suffer as a result of renewable technologies impact on both.
- Achieving a prosperous local economy has potential incompatibilities with contributions to climate change (SO11) and air quality (SO14) where business practices have the potential to negatively or positively effect both.
- Enabling everyone to a safe and healthy lifestyle has potential incompatibilities with biodiversity and geodiversity (SO6) through increased human activity in areas of biological interest.

Finally, the Sustainability Objective relating to Cultural Heritage (SO10) is not compatible or incompatible with any of the Core Strategy Aims.

**TABLE 5: COMPATIBILITY OF THE CORE STRATEGY AIMS AND SUSTAINABILITY OBJECTIVES**

<b>Core Strategy Aim / Sustainability Objective</b>	<b>1</b>	<b>2</b>	<b>3</b>	<b>4</b>
1 – Safe Environment	+	+	0	+
2 – Decent Homes	+	+	0	+
3 – Health	+	+	0	+
4 – Town centres	+	/	+	0
5 – Economic Growth	+	/	+	0
6 – Biological & Geological Diversity	/	+	0	/
7 – Sustainable Transport Choices	+	+	+	+
8 – Accessibility	+	0	+	+
9 – Education & Skills	+	0	+	+
10 – Cultural Heritage	0	0	0	0
11 – Contributions to Climate Change	/	+	/	+
12 – Water Quality	0	+	0	+
13 – Flooding	0	+	0	+
14 – Air Quality	/	+	/	+

Core Strategy Aim / Sustainability Objective	1	2	3	4
15 – Landscapes and Townscapes	+	/	+	0

### 3.3 Core Strategy Key Objectives

The Submission Draft Core Strategy sets out twelve key objectives which have been developed to reflect and underpin the vision and aims for Braintree District. These objectives are set out below, and their compatibility with the Sustainability Objectives is set out in Table 6. The majority of Sustainability Objectives are compatible with the Core Strategy Objectives; however, issues relating to air quality may not be adequately addressed through the objectives contained within the Core Strategy.

**TABLE 6: COMPATIBILITY OF THE CORE STRATEGY OBJECTIVES AND SUSTAINABILITY OBJECTIVES**

Sustainability Objective	Core Strategy Objective
1 – Safe Environment	Accessibility, Infrastructure, Housing, Built Environment, Leisure
2 – Decent Homes	Accessibility, Infrastructure, Housing, Employment, Rural Areas, Built Environment, Environment, Leisure
3 – Health	Accessibility, Infrastructure, Transport, Environment, Leisure
4 – Town centres	Accessibility, Employment, Transport, Town Centres, Key Service Villages, Rural Areas, Built Environment
5 – Economic Growth	Accessibility, Employment, Transport, Town Centres, Key Service Villages, Rural Areas,
6 – Biological & Geological Diversity	Sustainability, Environment
7 – Sustainable Transport Choices	Sustainability, Accessibility, Infrastructure, Employment, Transport, Town Centres, Key Service Villages, Rural Areas, Leisure
8 – Accessibility	Sustainability, Accessibility, Infrastructure, Housing, Employment, Transport, Town Centres, Key Service Villages, Rural Areas, Leisure
9 – Education & Skills	Accessibility, Infrastructure, Employment,
10 – Cultural Heritage	Built Environment
11 – Contributions to Climate Change	Sustainability, Accessibility, Transport, Environment, Leisure



12 – Water Quality	Flood Risk and Water Supply
13 – Flooding	Flood Risk and Water Supply
14 – Air Quality	
15 – Landscapes and Townscapes	Sustainability, Accessibility

## 4 STRATEGIC LOCATIONS

### 4.1 Introduction

*SEA Directive requires: 'The likely significant effects on the environment, including short, medium and long-term effects, permanent and temporary effects, positive and negative effects, and secondary, cumulative and synergistic effects, on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above issues.' Annex I (f)*

*'The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme. Annex I (g)'*

*SEA Directive requires: 'An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.' Annex I (h)*

Development and growth as set out within the Core Strategy is directed towards the three main towns (Braintree, Witham and Halstead), to a lesser extent to the key service villages as defined within the Core Strategy, with development within the other villages restricted to a response to local need.






Allocations within the urban areas and on previously developed land (PDL) are supported by evidence from the SHLAA, the Urban Capacity Study and the SHMA, all forming part of the District's Core Strategy Evidence Base. The Rural Services Study has been utilised to determine the classification of 'Key Service Villages' as locations to support potential new housing growth and the subsequent allocation of 450 new dwellings within these defined areas.

These studies have identified capacity for approximately 3,400 dwellings; however this still leaves a deficit of approximately 1,400 dwellings which cannot be provided within the existing urban areas. This deficit provides the justification for the need for Greenfield allocations within Core Strategy.

### 4.2 Growth Locations

Options for the strategic location of growth areas were explored in the One-District – One Vision consultation document in October 2008. Annex D of the Environmental Report outlines the SA/SEA appraisal of each of these locations for growth.

Table 7 outlines the appraisal of the four growth locations which are proposed within the Submission Draft Core Strategy. The first column contains the Sustainability Objective, while the second column outlines the detailed indicators used to appraise each location. Locations were appraised in accordance with the following criteria:

	In conformity with the criterion		Not relevant to the criterion
	In conflict with the criterion		Insufficient information available
	Partially meets the criterion / some constraints identified		

An explanation of the methodology and scoring criteria are explained fully within Annex D.

**TABLE 7: APPRAISAL OF GROWTH LOCATIONS**

SA/SEA Objective	Indicator	Land off Panfield Lane	SW of Gt. Notley	Lodge Farm	East of Forest Road
1) Create Safe Environments which do not undermine the quality of life or community cohesion	Will the site concentrate development near or within LSOAs in the most deprived 20% to 40% in the country?	+	0	+	0
2) To provide everyone with the opportunity to live in a decent home	Is the site proposal over the relevant thresholds for the application of the affordable housing policy?	+	?	?	+
3) To improve the health of the Districts residents and mitigate/reduce potential health inequalities.	Is it within 30 mins of a GP by walking or public transport?	+	+	+	+
	Will it lead to a direct loss of public open space or recreational facility?	-	?	+	+
4) To promote town centre vitality and viability	Is it within 30 mins a retail centre by walking or public transport?	+	+	+	+
5) To achieve sustainable levels of prosperity and economic growth	Will it increase employment land availability?	+	?	?	+
	Is the site proposed for mixed use development or employment?	+	?	?	+
	Would it lead to the loss of best and most versatile agricultural land (Grade 1, 2 and 3a)?	/	-	-	-
6) To conserve and enhance the biological and geological diversity of the environment	Is the site in close proximity (within 200m) to a SPA, SAC or Ramsar site?	+	+	+	+
	Is the site on or in close proximity (within 200m) to a SSSI, or National Nature Reserve?	+	+	+	+
	Is the site on or in close proximity (within 200m) to a Local Wildlife Site, Local nature Reserve or an area of Ancient Woodland?	+	+	+	/
	Is the site safeguarded within the minerals local plan?	0	0	0	0
7) To promote more sustainable transport choices.	Is the site proposed in close proximity (within 200m) to existing public transport route?	+	+	+	+
8) Promote accessibility.	Is it within 30 mins of a retail centre by walking or public transport?	+	+	+	+
	Is the site proposed in a location with accessible natural green space or recreational facilities?	+	+	+	+
9) To improve the education and skills of the	Is it within 30 mins of a primary school by walking or public transport?	+	+	+	+

SA/SEA Objective	Indicator	Land off Panfield Lane	SW of Gt. Notley	Lodge Farm	East of Forest Road
population	Is it within 30 mins of a secondary school by walking or public transport?	+	+	+	+
10) To maintain and enhance cultural heritage and assets within Braintree	Are there any listed buildings on or adjacent to the site?	/	+	+	+
	Is the site in or adjacent to a Conservation Area?	+	+	+	+
	Is the site in or adjacent to a Historic Park and Garden?	+	+	+	+
	Is the site in or adjacent to a Scheduled Monument?	+	+	+	+
11) To reduce contributions to climatic change	Will the scale of new development (greater than 10 dwellings or 1000m <sup>2</sup> of non-residential floorspace) require the 10% of its energy supply to be met by decentralised, low-carbon or renewable sources?	+	?	?	?
12) To improve water quality	Is the site proposed within a groundwater source protection zone?	+	+	+	+
	Is the site proposed within a water abstraction management area?	-	-	-	-
13) To reduce the risk of flooding	Does the site lie within Flood Risk Zones 2, 3a or 3b?	+	+	+	+
14) To improve air quality	Is the site proposed within an Air Quality Management Area (AQMA)?	+	+	+	+
15) To maintain and enhance the quality of landscapes and townscapes	Will the site lead to coalescence of urban extensions with nearby villages?	+	+	+	+

As can be seen, the Strategic Growth Locations accord well with the majority of Sustainability Objectives.

Braintree as a district contains a high proportion of Grades 2 and 3 agricultural land which is viewed as amongst the best and most versatile agricultural land. All of the growth locations appraised resulted in a loss of Grades 2 or Grade 3 agricultural land, which is likely to be an unavoidable impact of Greenfield development within the district.

Water resources within Braintree and Essex as a whole are stretched. As a County the water resource availability does not meet demand, and Essex is a net importer of water from outside of the County. Any additional demand for water through development will compound the existing issues relating to water supply within Braintree.

## 5 APPRAISAL OF THE CORE STRATEGY POLICIES

### 5.1 Introduction

*SEA Directive requires: 'The likely significant effects on the environment, including short, medium and long-term effects, permanent and temporary effects, positive and negative effects, and secondary, cumulative and synergistic effects, on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above issues.'* Annex I (f)

*'The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme. Annex I (g)'*

*SEA Directive requires: 'An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.'* Annex I (h)

This section explains the background to the policies, reviews their significant impacts, discusses any alternatives considered through the preparation of the emerging Core Strategy and highlights any proposed mitigation measures.

The individual appraisals of Strategic Growth Locations have been covered in Section 4 and Annex D, and are therefore not repeated within the Policy Appraisals.

For the purpose of clarity the exact wording of the policy text appraised for the purpose of this Environmental Report is shown in a yellow text box.

### 5.2 CS1: Housing Provision and Delivery

The Council will plan, monitor and manage the delivery of a minimum of 4637 dwellings between 2009 and 2026.

These dwellings will be mainly located, (as set out in Table CS1):

- Within the urban areas of Braintree, Witham and Halstead on previously developed land and infill sites apart from those protected for other land uses.

- On mixed use regeneration sites in Sible Hedingham and Silver End, whose boundaries will be defined on Master Plans to be approved as Supplementary Planning Documents.

- At new mixed-use Growth Locations at north-west Braintree, south-west Witham and north-east of Witham, as identified on the Proposals Map :-

  - North-west of Braintree – 44.3ha

  - South-west of Witham – 35.7ha

  - North-east of Witham – 16.24ha

They will be phased in accordance with Table CS1 to ensure that the requirement for a continuous supply of housing land is met and to ensure that the most sustainable locations are developed earlier on in the life of the Core Strategy. The development of the mixed-use growth locations will be in accordance with Master Plans to be approved as Supplementary Planning Documents by the Council. The uses will include community facilities, open space and infrastructure requirements.

- On previously developed land in the Key Service Villages

Table CS1 Braintree District Housing Provision		
Settlement	Minimum Housing Provision	Indicative Provision Dates
Braintree excluding growth locations	1500 dwellings	2009-2026
Braintree north-west Growth Location West of Panfield Lane	500 dwellings	phased between 2018-2026
Witham excluding growth location	900 dwellings	2009-2026
Witham south-west growth location North of Hatfield Road	600 dwellings	phased between 2017-2026
Witham north-east growth location off Forest Road	300 dwellings	phased between 2021-2026
Halstead	300 dwellings	2009-2026
Key Service Villages	450 dwellings	2009-2026
Remaining Villages	250 dwellings	2009-2026
Total	4800 dwellings	

### 5.2.1 Justification

The purpose of the policy is to plan, monitor and manage the delivery of a minimum of 4637 dwellings between 2009 and 2026. The policy responds to housing targets set for the District by the emerging East of England Plan.

Allocations within the urban areas and on previously developed land (PDL) are supported by evidence from the SHLAA, the Urban Capacity Study and the SHMA, all forming part of the District's Core Strategy Evidence Base. The Rural Services Study has been utilised to determine the classification of 'Key Service Villages' as locations to support potential new housing growth and the subsequent allocation of 450 new dwellings within these defined areas.

These studies have identified capacity for approximately 3,400 dwellings; however this still leaves a deficit of approximately 1,400 dwellings which cannot be provided within the existing urban areas. This deficit justifies the need for Greenfield allocations within Core Strategy.

Options for the strategic location of growth areas were explored in the One-District – One Vision consultation document in October 2008. The locations for Greenfield development, to come forward on a phased basis as strategic Growth Locations, are supported by studies commissioned by Braintree District Council including the Landscape Character Assessment and Assessment of Impacts of Potential LDF Sites on Existing Junctions – Braintree and Witham LDF Allocations.

## 5.2.2 Impact on SA objectives

	Sustainability Objectives														
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
Short Term	+	+	+	+	+	/	/	+	+	/	/	/	/	/	/
Medium Term	+	++	/	+	+	/	/	+	+	/	/	/	/	/	/
Long Term	+	++	/	+	+	/	/	+	+	/	/	/	/	/	/

### **Significant Effects**

The provision of a decent home for everybody (SO2) is strongly supported through the provision of housing in accordance with RSS allocations for the District.

The focus of housing delivery in Braintree and Witham responds well to providing housing growth in accessible locations with transport links (SO8), jobs (SO5), services, (SO1), commercial areas (SO4), schools (SO9) and leisure services (SO3).

There is uncertainty in the medium to long term where the capacity of current health facilities (SO3) is unknown and the pressures of new development including the impact of the growth locations may have negative effects. The development of housing in the Remaining Villages may have negative impacts on health where open space is not often accessible to the public and dwellings are not in accessible locations for health services. Without site specific information the impacts of Policy CS1 are uncertain on biodiversity (SO6), especially in the long term with development of the growth locations.

Similarly without site specific information the impacts on maintaining cultural heritage and assets (SO10), contributions to climate change (SO11), improving water quality (SO12), reducing the risk of flooding (SO13), improving air quality (SO14) and improving the townscape (SO15) are uncertain.

### **Temporal Effects**

The impacts on providing the opportunity to live in a decent home are likely to become more positive in the long term as the Growth Locations are developed.

### **Secondary, Cumulative and Synergistic Effects**

Many of the sustainability objectives would be positively impacted upon as a result of the cumulative and synergistic impacts of the Plan Policies being implemented together.

Further policies within the plan may collectively eliminate the uncertainty of the implementation of Policy CS1. In brief these are:

- Policy CS8 may reduce uncertainty with regard to reducing the risk of flooding (SO13) and improving water quality (SO12) by application of the sequential test to all new development and the encouragement of SUDs.
- Policy CS8 may also ensure that development proposals protect and enhance the natural environment, habitats and biodiversity (SO6).

- Policy CS9 with regard to contributions to climatic change (SO11) where the maximum possible use of renewable energy and energy efficient materials will be secured in all new development.
- Policy CS11 should reduce uncertainty relating to health provision (SO3) through the delivery of infrastructure to provide for the future needs of communities.

In addition to these, there are also a number of Policies which result in a cumulative strengthening of the positive effects of CS1. In brief these include:

- The focus of housing delivery in the Main Towns and Key Service Villages has a positive impact with regard to health through the delivery of open space provision as supported by Policy CS10 and SANG targets within the supporting text for Policy CS8.
- The location of the majority of housing development in the Main Towns will be supported by employment provision identified in Policy CS4.
- Due to the phasing regimes of the Growth Locations, the impacts on town centres may become more positive in the long term where regeneration and the improvement of the town centres can be secured as specified in Policy CS6. It is important that housing delivery is supplied in line with the regeneration of town centres as specified in Policy CS6.

### **5.2.3 Progress through SA process**

Policy CS1, was previously part of CS7 in the previous Core Strategy Consultation Document and was appraised in the SA/SEA for that document. The policy has developed through adopting the recommendations set out in the previous SA/SEA Environmental Report in so far as:

- The need to set out how the regional allocation is to be distributed throughout the District, including phasing details
- Including an order of priority with reference to previously developed land.

These details have been included within Policy CS1 of the Submission Document, including a breakdown of provision by settlement and new strategic Growth Location, as well as the provision in the Key Service Villages and Remaining Villages. An order of priority is effectively included through the inclusion of phasing details, and an additional focus for previously developed land to be utilised for development on all sites excluding the new Growth Locations.

### **5.2.4 Alternatives considered**

Other options for the level of housing provision were not investigated because the policy responds directly to provision set out in the revised East of England Plan.

Settlement Strategy Options were considered at the earliest stage of the SA/SEA process. The April 2007 SA/SEA Environmental Report considered various options including:

- Existing commitments and site within Existing Built up areas;
- Urban Concentration – New Development at Braintree, Halstead and Witham;
- Dispersal – New Developments spread more widely across the district,



- New Settlement
- New development to be located to assist with the provision of new infrastructure.

Table 8 outlines the outcome of the April 2007 appraisal of the Options for Growth.

**TABLE 8: OPTIONS FOR GROWTH**

Options	Outcome
Existing commitments and site within Existing Built up areas;	<ul style="list-style-type: none"> <li>- continuity for investment in provision of services as well as supporting the town centres.</li> <li>- facilitate mixed use development that could aid the local economy by providing premises for new and local businesses and helping to reduce out-commuting.</li> <li>- opportunity to provide more sustainable choices of transport, with failure to do so adversely impacting on air quality and safety due to traffic volumes and congestion.</li> <li>- likely to protect biodiversity and natural heritage over the wider area, though there may be local impact through re-use of vacant or green spaces and intensification of development would need to respect the character of the existing urban fabric.</li> <li>- could be dominated by high density, small-scale developments that could limit the ability of the District to achieve an adequate mix of housing types or proportion of affordable housing, provide renewable energy sources in new development, and adversely impact on water quality and flooding.</li> </ul>
Urban Concentration – New Development at Braintree, Halstead and Witham;	<ul style="list-style-type: none"> <li>- would mostly reflect the same impacts reported for the strategy based on ‘Existing Commitments and Sites within Existing Built Up Areas’.</li> <li>- provide opportunity for provision of a wider range of sites for economic development and a broader range of housing mix and affordability at the three named centres.</li> <li>- by limiting development in villages and rural areas housing and economic opportunity would be restricted in those areas with potential adverse impacts on provision of local services and jobs, with consequential increase in car travel.</li> <li>- the inclusion of greenfield urban extensions in the urban concentration strategy would also increase impacts on the biodiversity and environmental heritage of the District.</li> </ul>
Dispersal – New Developments spread more widely across the district,	<ul style="list-style-type: none"> <li>- would have greater adverse impacts than a strategy of urban concentration due to inclusion of more and smaller settlements.</li> <li>- increasing adverse impacts on biodiversity, water and air quality.</li> <li>- reducing the focus of development at the larger centres dispersal would reduce their ability to support local services and develop sustainable transport, without increasing the prospect of increased provision in villages and rural areas.</li> <li>- likelihood that housing growth in villages and rural areas would not be matched by jobs growth would increase car travel, especially for commuting.</li> </ul>
New Settlement	<ul style="list-style-type: none"> <li>- The scale and rate of development requirements in Braintree District are insufficient for a new settlement to have a positive impact during the period of the strategy.</li> <li>- adverse impact on biodiversity and the environmental heritage and not provide a sufficient economic focus, range of services, or sustainable transport to meet the needs of its residents.</li> <li>- would not meet housing and job provision needs elsewhere in the district.</li> <li>- limit the investment available for provision and enhancement of services in existing areas.</li> <li>- restricted opportunities for promotion of town centres and development of</li> </ul>

Options	Outcome
	sustainable transport would increase car travel, with negative impact on safety, air quality and climate change.
New development to be located to assist with the provision of new infrastructure.	<ul style="list-style-type: none"> <li>- assist in improving the road and rail transport network of the District.</li> <li>- adverse impacts on biodiversity and other environmental matters.</li> <li>- would not necessarily be best related to meeting local housing requirements where they arise or providing the most appropriate locations for business use.</li> <li>- adversely impact on town centres, access to local services and opportunities for sustainable transport, thus encouraging an increase in car use.</li> </ul>

The outcome of the April 2007 work informed the emerging strategy and assisted in the selection of the locations for growth within the Submission Core Strategy.

Alternative locations for the new mixed-use Growth Locations (including their housing provision element) were investigated throughout the Core Strategy preparation process and the appraisal of these sites can be found in the Annex D of the Environmental Report.

### 5.2.5 Impact on indicators

The implementation of Policy CS1 is most likely to impact on the following SA indicators:

- Indices of Multiple Deprivation Score (Housing and Services domain and the Living Environment domain).
- Type of housing stock.
- Population projections and forecasts.
- Access to sustainable transport links and services.
- Residents' opinions of and access to open space provision.
- Incidences of development on PDL.
- Incidences of residential flooding.

### 5.2.6 Proposed mitigation measures

The majority of new housing development is focussed on Brownfield land within existing settlements; therefore the Site Allocations DPD should reflect this in terms of allocating land and providing phasing details.

The development of housing in the Remaining Villages may have negative impacts on health where open space is not often publicly accessible and dwellings are not in accessible locations for health services. It is recommended that specific proposals are appraised with regard to open space and health care provision prior to allocation.

The delivery of housing in the Key Service Villages and the Remaining Villages (as defined) should be delivered in conjunction with rural employment proposals that may come forward in the DC Policies document. In addition housing delivery should be supplied in line with the regeneration of town centres through the implementation of Policy CS6.

## 5.3 CS2: Affordable Housing

Affordable Housing will be directly provided by the developer within housing schemes on the following basis:

1. A target of 40% affordable housing provision on sites in rural areas, excluding the Parishes of Sible Hedingham and Great Notley and the proposed growth location in the Parish of Rivenhall.
2. A target of 30% affordable housing provision on sites in the urban wards of Braintree and Bocking and Witham; including the proposed growth locations and in Halstead, the parishes of Sible Hedingham and Great Notley and the proposed growth location in the parish of Rivenhall.
3. A threshold of 5 dwellings or 0.16ha in the rural areas that is the whole District excluding the urban wards of Braintree and Bocking, Witham and Halstead.
4. A threshold of 15 dwellings or 0.5ha in the urban areas comprising the urban wards of Braintree and Bocking, Witham and Halstead.
5. Where it is impractical to achieve on site provision, off site provision, or a financial contribution in lieu of broadly equivalent value, may be accepted.

### 5.3.1 Justification

The purpose of Policy CS2 is to set appropriate targets for affordable housing at the district level as required by Policy H2 of the East of England Plan.

The targets and thresholds identified within Policy CS2 are supported by both the SHMA and the Affordable Housing Viability Study. These studies identify that house prices are typically substantially lower in the (defined) urban areas; the housing market has improved affordability without the need for planning policy. As such there is justification for a lower percentage at the district level than the regional target of 35% (as stated in the East of England Plan) of affordable housing in urban areas. Where house prices are higher in the District outside the defined urban areas, an increased affordable housing target of 40% on 5 dwellings plus or 0.16ha responds to an identified need through the aforementioned local assessments for these areas.

### 5.3.2 Impact on SA objectives

	Sustainability Objectives														
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
Short Term	/	++	+	+	0	0	/	+	+	0	0	0	0	/	/
Medium Term	/	++	+	+	0	0	/	+	+	0	0	0	0	/	/
Long Term	/	++	/	/	0	0	/	/	/	0	0	0	0	/	/

#### **Significant Effects**

The major significant effect of the implementation of Policy CS2 responds to the development of affordable housing within the Growth Locations supporting the opportunity to live in a decent home (SO2). The policy is likely to promote

development of Affordable Housing in urban areas in the short and medium term, whilst providing for Affordable Housing within the Growth Locations in the Long Term. Affordable Housing located within the urban areas in accordance with the distribution of development specified in Policy CS1, should be in accessible locations to services and facilities (SO3, 4, 8 and 9). However the location of Affordable Housing within the growth locations will need to be carefully managed to ensure access to services and facilities is adequate for these units.

### ***Temporal Effects***

Uncertainty with regard to the long term impacts relate to details of development within the Growth Locations being unknown at present. These will need to be carefully planned and managed to ensure that Affordable Housing within the Growth Locations is located appropriately. The impacts on providing the opportunity to live in a decent home and education through the relocation of Braintree College are likely to become more positive in the long term as the Growth Locations are developed yielding their affordable housing element.

### ***Secondary, Cumulative and Synergistic Effects***

In the rural areas an identified need for affordable housing in line with National Trends, justifies a higher target together with a lower threshold in these areas. Policy CS1 states that 250 dwellings will be located in the Remaining Villages. These rural areas of the District generally do not have an appropriate level of sustainable transport links and are in less accessible locations. The impact of this with regard to minimising traffic movements are largely dependant on the delivery of local employment opportunities, and the level of services in each locality as identified in the Rural Services Survey as part of the District's CS Evidence Base.

## **5.3.3 Progress through SA process**

Policy CS2 previously formed part of Policy CS8 in the previous consultation version of the Core Strategy. At that stage the affordable housing policy was included within a wider housing policy and stated a target of 40% Affordable Housing provision on a threshold of 0.2ha for the entire District, to be provided by the developer. The Affordable Housing element of Policy CS8 was appraised as follows:

'The policy responds to the need for inclusive access to housing which in combination with the District's Affordable Housing target will provide a larger proportion of the population an opportunity to live in the District.' (p23)

The policy has developed in line with evidence coming forward from the Affordable Housing Viability Study and the SHMA, forming part of the District's Core Strategy Evidence Base.

## **5.3.4 Alternatives considered**

A reasonable alternative for affordable housing delivery on a threshold of 5 dwellings or 0.2ha at 40% across the whole District was investigated within the 'One District – One Vision' preferred options document. This target was subject to SA/SEA within that document.

The change in target and threshold does not impact on the sustainability appraisal.

### **5.3.5 Impact on indicators**

Implementation of Policy CS2 is likely to impact the following SA indicators:

- Number of affordable houses delivered and as a percentage of housing stock
- House Prices
- IMD Score – Housing and Services Domain
- Access to sustainable transport links
- Population projections and forecasts
- Development occurring on PDL

### **5.3.6 Proposed mitigation measures**

In order to differentiate between the differing levels of sustainability regarding housing delivery in the Key Service Villages and those Remaining Villages, it is important to ensure that rural affordable housing is delivered in conjunction with employment schemes where local transport links and accessibility is poor. The implementation of both these policies would benefit from being located in villages that are well served by existing services as identified in the Rural Services Survey.

The district will need to ensure that the design criteria of housing are suitable for the character of the area in which the Affordable Housing is proposed, this would have to be on a site-by-site basis.

## 5.4 CS3: Gypsy and Travellers and Travelling Showpersons Accommodation

Provision will be made for a minimum of 50 authorised residential pitches for gypsies and travellers caravans by 2011 and a minimum of 67 pitches by 2021. This will require the provision of 23 authorised pitches by 2011 and a further 17 authorised pitches by 2021.

Provision will also be made for 5 transit pitches for gypsies and travellers by 2013 and a total of 6 transit pitches by 2021 and for a minimum of one additional plot for travelling showpeople (in addition to the existing provision) by 2021.

The Council will identify gypsy and traveller sites and a travelling showpersons plot, to meet this provision, in the Allocations DPD, in accordance with the following criteria:-

- Sites should be well related to existing communities and located within reasonable distances of services and amenities such as shops, schools and medical facilities.
- Sites should be located, designed and screened to minimise their impact on the environment.
- Sites should have safe vehicular access to and from the public highway.
- Sites should be located within areas not at risk from flooding.
- Sites should be capable of being provided with drainage, a water supply and other necessary utility services.
- Sites should be of an appropriate size to provide the planned number of caravans, parking, turning and servicing of vehicles, amenity blocks, play areas, access roads and structural landscaping. In addition, the travelling showpersons plot should be large enough for the storage and maintenance of showpersons rides and equipment.

### 5.4.1 Justification

Policy CS3 is required by CLG Circular 01/2006 and Circular 04/2007, and by the revised East of England Plan and Policies H3 and H4 of the single issue revision of that document entitled 'Accommodation for Gypsy and Traveller and Travelling Showpeople in the East of England.'

Braintree is required to plan for Gypsy and Traveller accommodation through the districts LDF. Local needs are justified through the 'Essex Gypsy and Traveller Accommodation Assessment' 2009.

Site specific allocations will be provided by the Council within the Site Allocations DPD. However the use of criteria based policy ensures that sites which come forward prior to adoption of the Site Allocations DPD will need to be in accordance with the Core Strategy Policy CS3.

### 5.4.2 Impact on SA objectives

	Sustainability Objectives														
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
Short Term	/	+	+	0	0	0	/	+	+	0	0	+	+	/	0
Medium Term	/	+	+	0	0	0	/	+	+	0	0	+	+	/	0
Long Term	/	+	+	0	0	0	/	+	+	0	0	+	+	/	0

#### **Significant Effects**

The number of pitches identified for delivery responds to Policies H3 and H4 of the East of England Plan revision and conform to the requirements of the Essex Gypsy and Traveller Accommodation Assessment 2009, thus having a positive impact on providing decent homes for all (SO2).

The impacts of this policy on the creation of safe environments and social cohesion (SO1) are uncertain, as this will be largely dependant on the specific location of sites. There is further uncertainty with regard to sustainable transport choices (SO7) and air quality (SO14) which again would be largely dependant on the location of sites, and means of transportation available.

The inclusion of criterion within Policy CS3 ensures that whilst exact locations of sites are not known at present, a number of sustainability credentials will need to be adhered to in order for a site to be in conformity with the Core Strategy once adopted.

Criterion 1 of Policy CS3 advises that future sites should be located within reasonable distance to services and amenities, impacting positively on health (SO3) accessibility (SO8) and education (SO9). Criterion 4 ensures that sites are not located within areas at risk of flooding (SO13). Criterion 5 protects water quality by ensuring that sites are capable of being provided with drainage and a water supply. However the use of the word 'should' allows an element of uncertainty as to how effective the policy will be in practice, therefore none of these elements have been awarded a significant positive.

#### **Temporal Effects**

There are no temporal effects identified at this stage where much depends on the specific scale and location of allocations to be identified in the Site Allocations DPD.

#### **Secondary, Cumulative and Synergistic Effects**

There are no secondary, cumulative and synergistic effects identified at this stage where much depends on the specific scale and location of allocations to be identified in the Site Allocations DPD, and how specific sites interact with development proposals and requirements identified in the wider strategy.

### 5.4.3 Progress through SA process

Policy CS3 previously formed part of Policy CS8 in the previous consultation version of the Core Strategy. At that stage the Gypsy, Traveller and Travelling Showpeople requirements of the strategy were included within the wider housing provision policy and appraised as follows:

‘Provision for gypsies and travellers and for travelling showpeople should be in accordance with the outcome of the current review of the Regional Spatial Strategy.’ (p3)

The policy has developed to provide a single issue policy relating to housing provision for the gypsy, traveller and travelling showpersons community. The policy has also developed to provide a criterion based policy to assess sites which may come forward prior to adoption of the Site Allocations DPD.

#### **5.4.4 Alternatives considered**

Other options for the gypsy, traveller and travelling showpeople policy were not investigated. The policy responds to government guidance which requires that the Core Strategy set out criteria, and the site provision responds to the requirements of the East of England Plan single issue revision document.

#### **5.4.5 Impact on indicators**

Implementation of Policy CS3 could impact on the following SA indicators:

- Indices of Multiple Deprivation
- Accessibility to GPs and Schools

#### **5.4.6 Proposed mitigation measures**

There are no proposed mitigation measures recommended at this stage. Specific measures will be made on a site-by-site basis in the Site Allocations DPD.



## 5.5 CS4: Distribution of Employment

The Council and its partners will support the economy of the District and will aim to provide a minimum of 14,000 net additional jobs in the District between 2001-2026. Employment sites in current or recent use in sustainable locations will be retained for employment purposes.

Land for employment purposes will be mainly located:-

- On existing employment sites within the development boundaries of Braintree, Witham, Halstead and Great Notley, the six key service villages, Earls Colne Airfield and Sturmer (adjoining Haverhill).

- On mixed use regeneration sites in Sible Hedingham and Silver End. Master Plans will be required for these strategic sites, to be approved by the Council as Supplementary Planning Documents.

- On strategic sites, the boundaries of which are defined on Core Strategy Proposal Map Insets. These comprise an 18.5ha innovation and enterprise business park at Great Notley and a 15ha employment area north-west of Braintree, which is part of a larger mixed-use strategic site. These are to be developed for uses set out in Table CS4 together with infrastructure requirements. Master Plans will be required for these strategic sites, to be approved by the Council as Supplementary Planning Documents.

The Council and its partners will also protect and enhance key existing tourist and visitor facilities and will promote suitable new tourist development in appropriate locations, in order to increase the range, quality and type of facilities available.

Table CS4 Braintree District Strategic Employment Site Provision

Growth Location	Type of Employment	Employment Provision (Ha)
Braintree – Land to the north-west off Panfield Lane.	General Employment B1-B8. Site for football stadium, college campus, educational provision, services and community uses.	15ha.
Growth Location: Braintree – Land to the west of the A131 at Great Notley.	Innovation and Enterprise Business Park B1a, B1b, B1c, B2 and C1 hotel use. Structural landscaping/wildlife corridor of 7ha.	18.5ha
Total:		33.5ha

### 5.5.1 Justification

The purpose of the policy is to set out future employment provision in the District over the plan period.

The policy responds to the economic requirements set out in the East of England Plan. These equate to an indicative target of 9,625 net job growth between 2001-2026. The Cambridge Econometrics Study commissioned, suggests a jobs target of

up to 14,000 new jobs to provide for the future population of the District and address the current high numbers of out commuting.

The Employment Land Review (2007) which forms part of the Core Strategy evidence base identified employment floorspace in the District's main towns and in comparison to the population breakdown of the District. It suggested that provision should be made for an additional 3 to 5 hectares of employment land per year through the plan period. The review concluded that sites in current or recent employment use should be retained unless the site or location is unsuitable for modern standards of development, or that it would be a bad neighbour to adjacent sites.

The Employment Land Review also suggested that consideration be given to the designation of a new business park close to the A120, in the vicinity of Braintree to provide for new demand generated by airport related expansion at Stansted and by the recent dualled A120 between the M11 and Braintree.

### 5.5.2 Impact on SA objectives

	Sustainability Objectives														
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
Short Term	+	0	0	+	++	/	/	/	/	/	/	/	/	/	/
Medium Term	+	0	0	+	++	/	/	/	/	/	/	/	/	/	/
Long Term	+	/	0	+	++	/	/	/	+	/	/	/	/	/	/

#### **Significant Effects**

The provision of employment land throughout the district in accordance with Policy CS4 should contribute to maintaining the economy of the District (SO5) and achieving a better balance between homes and jobs which would have positive impacts on the quality of life of residents (SO1). Furthermore retention of existing employment sites, and promotion of employment sites within the urban area should have a positive impact on footfall within the town centres.

There is however a great deal of uncertainty with regard to a high number of the sustainability objectives. Without site specific information the impacts of Policy CS4 are uncertain on biodiversity (SO6), especially in the long term with development of the growth locations. Similarly without site specific information the impacts on sustainable transport choices (SO7), accessibility (SO8), contributions to climate change (SO11), improving water quality (SO12), reducing the risk of flooding (SO13), improving air quality (SO14) and improving the townscape (SO15) are uncertain. These issues would need to be dealt with through individual site assessments or as part of any site allocations DPD or planning application.

There is also uncertainty relating to the historic environment (SO10). Policy CS4 includes the re-use of the historic factory buildings and retention of the Critall powerhouse as a museum in Silver End as part of the site's regeneration. Despite this, until the specific design of sites is known, the impacts will be uncertain.

There is further uncertainty with regard to education and skills, where Policy CS4 does not elude to the types of jobs which are to be created in the district and the opportunity for improving skills within the workforce.

### ***Temporal Effects***

The impacts on providing the economic growth and improving the education and skills of the population are likely to become positive in the long term as the Growth Locations are scheduled to be developed with employment in specific sectors. There is uncertainty in the long term with regard to the opportunity to live in a decent home where the phasing of employment land in the mixed use growth locations will need to be in line with the housing element specified in Policy CS1.

### ***Secondary, Cumulative and Synergistic Effects***

Many of the sustainability objectives may be positively impacted upon as a result of the cumulative and synergistic impacts of the Plan Policies being implemented together.

Further policies within the plan collectively eliminate the uncertainty of the implementation of Policy CS4. In brief these are:

- Policy CS8 reduces uncertainty with regard to reducing the risk of flooding (SO13) and improving water quality (SO12) by application of the sequential test to all new development and the encouragement of SUDs.
- Policy CS8 will also ensure that development proposals protect and enhance the natural environment, habitats and biodiversity (SO6).
- Policy CS9 with regard to contributions to climatic change (SO11) where the maximum possible use of renewable energy and energy efficient materials will be secured in all new development.

### **5.5.3 Progress through SA process**

Policy CS4 has progressed from Policies CS4 and CS5 which were contained within the previous consultation on the Core Strategy.

The policy has developed into a single issue policy for employment in the District outlining the approach for existing allocations and the distribution of new employment development as an element of the new mixed-use Growth Locations.

The detailed appraisal of the previous Policy CS4, specified a need for a coordinated programme to link progress in economic and other development with sustainable transport initiatives to ensure appropriate transport facilities were available upon first use of development. The Submission Document responds positively to this recommendation through Policy CS7, which specifies key transport projects for the District to include a link road at Panfield Lane, Quality Bus Partnership and pedestrian and cycle link improvements between town centres and the Growth Locations, as well as junction and crossing improvements.

The detailed appraisal of previous Policy CS5, recommended that the policy wording could be improved to clarify that a total of 66 hectares of employment land will be available (including 32.5 hectares of existing vacant/allocated employment land) and that it is this total that will be phased to ensure a continuous 7-year supply, not just the additional provision of 33.5 hectares. The policy wording of CS4 in the Submission Document does not include this, and details of the specific phasing of employment development are absent.

### 5.5.4 Alternatives considered

The initial April 2007 document considered the following options for employment locations:

- Existing and Vacant Employment Sites
- New strategic Employment Location
- Rural Employment

Table 9 outlines the outcome of the April 2007 appraisal of the options for employment land.

**TABLE 9: OPTIONS FOR EMPLOYMENT LAND**

Options	Outcome
Existing And Vacant Employment Sites	<p>The concentration of employment in a limited number of employment areas, together with a concentration of jobs in the town centres offers the opportunity to create sustainable transport networks to serve them. Lack of appropriate employment sites would limit economic potential and this, together with dispersal of employment sites, would generate increased car travel.</p> <p>Vacant employment sites, whether brought back into employment use or reallocated for other uses, could have an adverse impact on local biodiversity and environment, where habitats and species have re-established. Such sites could also have an impact on air and water quality due to contamination, which would require appropriate remedial action to prevent further adverse environmental impact. Some small employment sites within built-up areas may have an adverse impact on adjoining uses, transport and environment. Where employment sites are redeveloped the opportunities for mixed uses should be considered, to encourage sustainable transport choices.</p>
New Strategic Employment Location	<p>A new strategic employment location would promote economic growth provided it met future business needs that could not be met on existing sites within the District. A location well related to existing settlements would promote sustainable transport choices; use of town centres and local services; and assist skills development. A greenfield location would have adverse impacts on biodiversity and environmental matters, with impact on air and water quality dependent not only on the site characteristics but also the operations of the site occupiers.</p>
Rural Employment	<p>Opportunities for employment in rural areas would assist their prosperity and promotion of sustainable transport by providing more local workplaces. However, employment uses should be compatible with the natural and cultural assets of rural areas and ensure that water and air quality standards are met. The displacement of urban employment uses to the countryside should be avoided because it would encourage increased car travel.</p>

The outcome of the April 2007 consultation was used to inform the preparation of the next stage of Core Strategy consultation.

Alternative policy approaches were considered for the development of the economy in the District in the 'On District – One Vision' document. These included a lower annual level of development at 3ha per year through the plan period, reducing the level to 57ha (CS4ALT1). Other options were to seek a higher level of job growth to match the East of England requirements for Chelmsford and Colchester (CS4ALT2).

An additional site allocation for employment uses was considered in Policy CS5 of the 'One District – One Vision' document for the provision of general employment on a 6ha site in Witham on land to the north-east of Eastways (within Rivenhall). This

corresponded to a smaller site for the business park at Great Notley by 6ha (and no landscaping element) to reach the figure of 33.5ha. Further alternatives were discounted within this document looking at 'significantly different locations' (CS5ALT1), an alternative location for the business park north of the A120 in Braintree (CS5ALT2), the land requirements for a higher annual level of employment development (CS5SLT1), and an alternative reducing the proposed level of employment development by either reducing the Braintree provision by 9 hectares, or by removing the proposed additional provision of 6ha north of Witham at Rivenhall and reducing the Braintree provision by 3ha.

The likely and potential impacts arising from Policy CS4 within the Submission Draft are significantly more positive than the corresponding relevant alternatives included within the 'One District – One Vision' document. This is due to the successful inclusion of sustainable transport projects relating specifically to employment development and those of the mixed-use Growth Locations within the strategy in Policy CS7. From a social perspective, the removal of a strategic employment site at Eastways in Witham/Rivenhall responds to a need to address the imbalance between population and employment opportunities.

### **5.5.5 Impact on indicators**

The implementation of Policy CS4 could impact the following SA indicators:

- Travel to work methods and flows
- Number of VAT registered businesses in the area
- Employment status of residents
- Average gross weekly pay
- Amount of vacant industrial floorspace
- Standard occupational classification
- Percentage of energy supplied from renewable sources

### **5.5.6 Proposed mitigation measures**

The Policy could be further improved by inclusion of the phasing details of new employment development over the plan period. This is especially important in line with the phasing of the housing element within the Growth Locations that are included within Policy CS1.

The policy wording could be improved to clarify that a total of 66 hectares of employment land will be available (including 32.5 hectares of existing vacant/allocated employment land) and the phasing details of this total as well as the additional proposed 33.5ha.

Renewable energy use can be maximised in new employment development and should be incorporated into development proposals within the forthcoming Site Allocation DPD and relevant SPDs for specific areas. All proposals will need to be carefully assessed for their impact on the natural and built environment.

The amount of available employment land will need to be monitored to ensure that adequate supply is available, and conversely, allocations may need to be reviewed if there is no demand.

## 5.6 CS5: The Countryside

Development outside the main towns, key service villages and other villages will be strictly controlled to uses appropriate to the countryside, in order to protect and enhance the landscape character and biodiversity of the countryside

### 5.6.1 Justification

Policy CS5 seeks to control development in the countryside in line with protecting the natural environment within Braintree.

The policy is supported by PPS1, PPS4, PPS7, PPS9, the Landscape Character Assessment (2006) and the Rural Services Survey.

### 5.6.2 Impact on SA objectives

	Sustainability Objectives														
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
Short Term	0	0	0	0	+	+	0	0	0	+	0	0	0	0	+
Medium Term	0	0	0	0	+	+	0	0	0	+	0	0	0	0	+
Long Term	0	0	0	0	+	+	0	0	0	+	0	0	0	0	+

#### ***Significant Effects***

The policy will have a small positive impact on achieving sustainable levels of prosperity and economic growth (SO5) through appropriate development occurring in the countryside where necessary.

There will be a positive impact on conserving the biological and geological diversity of the environment (SO6) resulting from this policy. Impacts are limited however where it is uncertain how these features will be enhanced by any new development coming forward.

There will be an indirect positive impact on maintaining and enhancing cultural heritage and assets (SO10). Much of the rural District has a tradition of existing medieval field boundaries that will be protected through the policy. There will also be a positive impact on maintaining the quality of landscapes (SO15) as a result of this policy through a strict control of development. Despite this, the policy could include reference to the built environment in the countryside, particularly with regard to cultural heritage and the re-use of existing buildings to support rural diversification, or include the issue within the Development Management Policy DPD.

#### ***Temporal Effects***

There are no temporal effects identified at this stage.

### ***Secondary, Cumulative and Synergistic Effects***

Some of the sustainability objectives may be positively impacted upon as a result of the cumulative and synergistic impacts of the Plan Policies being implemented together.

Further policies within the plan collectively eliminate instances of no impact with the implementation of Policy CS5. In brief these are:

- There will be a positive indirect impact on promoting more sustainable transport choices (SO7) where development is focused in more sustainable locations as a result of this policy in synergy with Policy CS7.
- There will be a small positive indirect impact on promoting accessibility (SO8) where development is focused in more sustainable accessible locations as a result of this policy in synergy with Policy CS7.
- The impacts of this policy on cultural heritage (SO10) will be strengthened in synergy with Policy CS9 where development responds to local context, in recognition of the cultural value of much of the Districts rural buildings.

#### **5.6.3 Progress through SA process**

Policy CS5 was proposed as Policy CS6 in the previous consultation document and was specific to the rural economy. At that stage the policy was appraised as follows: 'The proposed policy supports economic sustainability objectives, but potentially conflicts with environmental objectives, especially those which are related to the use of private motor vehicles. The policy would benefit from a strategy to deal with the potential re-location of operations which increase in scale to more sustainable locations. Similarly attention should be paid to the cumulative impact of small developments.'

The policy has evolved through the plan making process to focus on all small scale development in the countryside in the Submission Draft and, in light of sustainable transport concerns, further to the policy as it now exists.

#### **5.6.4 Alternatives considered**

The initial April 2007 document considered the following options for the rural economy:

- A more or less strict policy (CS6ALT1).
- The rural economy element to be included within the main Provision of Employment policy (CS6ALT2).

These alternatives were subject to appraisal within that document and were found to be less sustainable alternatives.

#### **5.6.5 Impact on indicators**

The implementation of Policy CS5 could impact the following SA indicators:

- Indices of Multiple Deprivation – Barriers to Housing and Services domain
- Number of listed buildings
- Additions/subtractions to the Historic Buildings at Risk Register

### **5.6.6 Proposed mitigation measures**

The policy could include reference to the built environment in the countryside, particularly with regard to cultural heritage and the re-use of existing buildings to support rural diversification, however it is noted that these issues may be included within the Development Management Policy DPD.



## 5.7 CS6: Town Centre Regeneration and Retail

The town centres of Braintree, Halstead and Witham will be the primary location for retail, office, leisure and entertainment uses in the District.

The improvement and regeneration of town centres will be promoted and the regeneration of the following locations is proposed to meet the identified need for additional retailing and other town centre uses:

Braintree Town Centre - Land to the east of the Town Hall Centre between Manor Street and Victoria Street and land to the west of George Yard Shopping Centre

Witham Town Centre - The Newlands Shopping Centre and adjoining land

Halstead Town Centre - The areas around The Centre, Weavers Court and land to the east of the High Street

Any additional proposals for retailing and town centre uses will be based on the sequential approach in accordance with PPS4.

The scale of development will need to be consistent with the following hierarchy with larger scale development focussed on the town centres:

Town Centres – Braintree, Halstead and Witham town centres

District Centres – Great Notley Neighbourhood Centre

Local Centres – Coggeshall, Earls Colne, Hatfield Peverel, Kelvedon, Sible Hedingham, and Silver End and within the growth locations at Panfield Lane Braintree and within the Maltings Lane development, Witham.

Local Centres will be protected and enhanced to provide small-scale shops, services and community facilities for local residents.

The provision of local shops and services throughout the District will be safeguarded to provide for the needs of local residents.

Impact assessments will be required for any retail proposal not within a primary shopping area.

### 5.7.1 Justification

Policy CS6 seeks to maintain and develop the existing town centres and local centres within Braintree.

The policy is supported by PPS4, the North Essex Retail Study, the Braintree Town Centre Analysis document, and the Rural Services Survey.

### 5.7.2 Impact on SA objectives

	Sustainability Objectives														
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
Short Term	0	0	0	++	+	/	/	+	0	/	/	0	0	/	/
Medium Term	0	0	0	++	+	/	/	+	0	/	/	0	0	/	/
Long Term	0	0	0	++	+	/	+	+	0	/	/	0	0	/	/

### ***Significant Effects***

The impacts on promoting the vitality and viability of the District's town centres (SO4) should be a major positive in response to Policy CS6. Achieving sustainable levels of prosperity and economic growth (SO5) and promoting accessibility would also be positively impacted through the implementation of this policy.

There is however a degree of uncertainty with regard to the impacts of this policy on biodiversity (SO6), more sustainable transport choices (SO7) and contributions to climate change (SO11) where the specific details of the regeneration proposals are unknown at this stage. The impacts of this policy on maintaining and enhancing cultural heritage and assets (SO10) and the quality of townscapes (SO15) are uncertain where the specific details of the regeneration proposals are unknown at this stage. The issue of cultural heritage is of key importance with regard to the historic element of the District's Town Centres.

It is uncertain whether the policy will improve air quality (SO14) in the District's Town Centres. Potentially significant junctions, each with a recorded daily flow of more than 10,000 vehicles in 2004 are located at Newland Street and Crossing Road in Witham, Head Street in Halstead, and Railway Street and Rayne Road in Braintree, and it will be important to ensure that town centre regeneration and development does not compound the air quality issues at these locations.

### ***Temporal Effects***

The provision of facilities for local residents will have a positive impact on promoting more sustainable transport choices (SO7) in the long term in line with the development of the Growth Locations. This element of the policy enables walking and cycling to become more viable for convenience shopping in these developments.

### ***Secondary, Cumulative and Synergistic Effects***

In synergy with the proposed capacity improvements of the A12 and A120 as outlined within Table 2 of the Submission Draft Core Strategy, it is possible that there will be positive or negative impacts on promoting the vitality and viability of the District's town centres (SO4), associated economic growth in these centres (SO5), promoting sustainable transport choices (SO7) and promoting accessibility to the centres (SO8) depending on town centre regeneration proposals being implemented at an appropriate time with regard to those of the infrastructure requirements of the wider strategy. If not, this could make the town and district centres of neighbouring District's and Boroughs more accessible and attractive by private car.

There are likely to be positive impacts regarding reducing contributions to climate change (SO11) in synergy with Policy CS9.

### **5.7.3 Progress through SA process**

Policy CS6 was proposed as Policy CS7 in the previous consultation document. At that stage the policy was appraised as follows: 'The strategy proposed locates regeneration and development in the most sustainable locations.' 'Detailed sustainability appraisals will be required for site specific proposals when they are known.'

The policy has developed to include a focus on sites within the three Main Towns that would be appropriate for town centre regeneration. There is also a wider focus to

improve retail in the District Centre of Great Notley Neighbourhood Centre and the District's Local Centres.

#### **5.7.4 Alternatives considered**

Other options for Town Centres and Regeneration were “to promote the development of the Innovation / Business Park ahead of town centre regeneration, or to promote the redevelopment of unsuitable employment sites ahead of other priorities” (CS7ALT1) and “to set out more detailed policies for these priorities in the Strategy rather than leaving them to the later plans” (CS7ALT2). However the former alternative was not deemed to be a reasonable alternative as it runs contrary to national policy as set out within PPS4.

#### **5.7.5 Impact on indicators**

Implementation of Policy CS6 is likely to impact on the following SA indicators:

- Indices of Multiple Deprivation – Barriers to Housing and Services domain
- Floorspace data
- Employment status of residents and job type
- Access to town centre data

#### **5.7.6 Proposed mitigation measures**

It is recommended that the incorporation of SUDS and elements of landscaping are investigated within proposals where relevant to alleviate surface water flooding and associated water quality issues, enhance biodiversity, improve the quality of townscapes and provide amenity benefit.

## 5.8 CS7: Promoting Accessibility for All

The Council will work with partners to improve accessibility, to reduce congestion and reduce the impact of development upon climate change.

Future development will be provided in accessible locations to reduce the need to travel.

Sustainable travel will be encouraged through the requirement for travel plans from major developments, employers and institutions.

Sustainable transport links will be improved, including provision of and contributions for cycling and walking and quality bus partnership.

Traffic and car parking will be carefully managed to encourage sustainable travel.

The promotion of community based initiatives such as car pools, car sharing and voluntary mini-bus services will be encouraged.

### Table CS7 Key Transport Projects Provision.

- Witham Station Footbridge across railway line

- Freeport, Braintree Cycle/Footbridge across railway line

- Feasibility Study of Braintree Railway Branch Line improvements to improve frequency of service

- Capacity improvements at Pods Brook Road / Rayne Road roundabout in Braintree

- Spine road from Springwood Drive to Panfield Lane, Braintree designed for local traffic only

- Creation of new access and improvements at the A131 / Cuckoo Way roundabout

- Motts Lane foot and cycle bridge in Witham

- Capacity improvements at Hatfield Road / Gershwin Boulevard roundabout in Witham

- Improvements to the Cypress Road / Braintree Road roundabout in Witham

### 5.8.1 Justification

The purpose of the policy is to promote accessibility throughout the District, in order to reduce congestion and encourage sustainable travel.

The policy is supported and required by Policy T4 of the revised East of England Plan. LDDs need to identify ways to bring about a shift away from car use to public transport, walking and cycling by ensuring urban extensions are linked to the urban structure through pedestrian and cycling routes and a high standard of public transport and with area wide improvements in provision.

The Key Transport Projects relate to an identified need to provide improved access in support of the Core Strategy's proposals for housing, employment and the mixed-use Growth Location as highlighted in the 'Assessment of Impact of Potential LDF Sites on Existing Junctions – Braintree and Witham LDF Allocation' document forming part of the Core Strategy evidence base.

## 5.8.2 Impact on SA objectives

	Sustainability Objectives														
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
Short Term	0	0	/	0	0	0	+	/	0	0	/	0	0	/	0
Medium Term	0	0	/	0	0	0	+	/	0	0	/	0	0	/	0
Long Term	0	0	/	0	0	0	+	/	0	0	/	0	0	/	0

### **Significant Effects**

Policy CS7 seeks to promote more sustainable transport choices (SO7) however is not viewed as likely to provide a significant positive impact, as implementation and enforcement of CS7 may be difficult in practice.

The fourth sentence within Policy CS7 includes provision for cycling and walking which could have positive impacts on health (SO3), however the impact has been viewed as uncertain due to uncertainty as to who would provide these contributions.

Similarly the second sentence within Policy CS7 states that future development will be provided in accessible locations, however the Core Strategy would benefit from a definition as to what would be acceptable as an 'accessible location' in order for the policy to be implemented effectively to improve accessibility (SO8).

The impacts on climate change (SO8) and air quality (SO11) are both viewed as uncertain due to a lack of full clarification as to how policy CS7 could be implemented in practice.

### **Temporal Effects**

The link road between Springwood Drive and Panfield Lane as part of the Panfield lane Growth Location will have a positive objective on safety (SO1) and will alleviate potential congestion pressures in Braintree Town Centre and improve air quality (SO14) at a Potentially Significant Junction along Rayne Road. Cycle and pedestrian interconnectivity between the relocated Braintree College and the Town Centre along this route will be important, particularly in relation to the Railway Station in the Town and is further supported in the Policy.

The current position in Witham is that those wishing to head southbound on the A12 from the north of the town, and those wishing to access the south of the town from the A12, are directed through the town centre and a Potentially Significant Junction on Newland Street. Negative impacts may be exacerbated in light of the new proposed Growth Location at Hatfield Road in south Witham. However, an increase in walking and cycling opportunities as a result of this policy would alleviate the majority of additional traffic due to the site's close proximity to the town, the development of a local centre at Maltings Lane and existing public transport links along this route.

### **Secondary, Cumulative and Synergistic Effects**

This Policy will have positive impacts on townscapes (SO15) in conjunction with Policy CS9 through the highest possible standards of design and layout for new public realm schemes.

### **5.8.3 Progress through SA process**

Policy CS7 was included within the previous consultation version of the Core Strategy. At that stage the policy was appraised as follows: 'The proposed policy supports sustainability objectives relating to transport and environmental protection. However the mechanisms for delivery and implementation of the strategy would benefit from further elaboration.'

The policy has developed from aspirational aims to a more focussed series of projects to support the development proposals of the wider Strategy in conjunction with the recommendations of the 'One District – One Vision' SA/SEA Environmental Report.

### **5.8.4 Alternatives considered**

Other options for promoting accessibility were included although not taken forward in the 'One District – One Vision' document. These were an alternative to do nothing (CS1ALT1), to make public transport, walking and cycling less of a priority (CS1ALT2), to locate developments in less accessible locations (CS1ALT3), to not support improvements to the main trunk road and rail networks (CS1ALT4), and to include more detail within the policy to address issues and layouts in different and specific areas of the District (CS1ALT5). These alternatives were subject to appraisal within that document and were found to be less sustainable alternatives.

### **5.8.5 Impact on indicators**

Implementation of Policy CS7 is likely to impact the following SA indicators:

- Indices of Multiple Deprivation Score – Barriers to Housing and Services domain
- Travel to work methods and flows
- Public transport punctuality
- Journey time reliability
- CO2 emissions at Potentially Significant Junctions
- PM10 emissions at Potentially Significant Junctions
- Car ownership
- Access to services

### **5.8.6 Proposed mitigation measures**

Safety issues should be addressed through broad design requirements highlighted in the policy or for specific proposals. This is especially relevant in light of improvements for walking and cycling and with regard to the design of car parking facilities.

Through the specific development of pedestrian and cycle routes as a result of this policy, green corridors and features of a biodiversity value could be integrated into proposals. This is also likely to increase their use through the creation of an attractive public realm. The implementation of SUDS in new public realm schemes to minimise any surface water implications are encouraged and help to enhance biodiversity.

## 5.9 CS8: Natural Environment and Biodiversity

All development proposals will take account of the potential impacts of climate change and ensure the protection and enhancement of the natural environment, habitats and biodiversity and geo-diversity of the District. This will include protection from:-

- Air, noise, light and other types of pollution
- Excessive use of water and other resources
- The generation of waste

Development should protect the best and most versatile agricultural land

Development must have regard to the character of the landscape and its sensitivity to change and where development is permitted it will need to enhance the locally distinctive character of the landscape in accordance with the Landscape Character Assessment. Landscape Character areas will be defined in the Allocations Document and further guidance will be set out in a supplementary planning document.

The natural environment of the District especially those areas designated for their natural conservation value on the Proposals map, will be protected from harm and the restoration and enhancement of the natural environment will be encouraged through a variety of measures such as;

- Maximising opportunities for creation of new green infrastructure and networks in sites allocated for development
- Creating green networks to link urban areas to the countryside
- Enhancing the biodiversity value of wildlife corridors
- Designating and protecting local nature reserves and county wildlife sites
- Conservation and enhancement of SSSI's in accordance with the Wildlife and Countryside Act
- Development will promote wildlife enhancements which will contribute to the habitat and species restoration targets set out in the Essex Biodiversity Action Plan

The Council will minimise exposure of people and property to the risks of flooding by following the national guidance laid out in PPS25, in particular the sequential test. Sustainable Drainage Systems (SUDS) will be encouraged to reduce flood risk, promote groundwater recharge, enhance biodiversity and provide amenity benefit, unless, following an adequate assessment, soil conditions and/or engineering feasibility dictate otherwise.

Opportunities to improve water quality in all watercourses and waterbodies will be taken where possible and measures will be taken to prevent the deterioration in current water quality standards.

The Council will seek to promote the use of water efficiency measures.

### 5.9.1 Justification

The policy is supported by the revised East of England Plan, a Habitats Regulation Assessment and the Essex Biodiversity Action Plan. Policy CS8 seeks to protect and enhance the natural environment of Braintree and requires that all new development proposals take account of future climate change.

## 5.9.2 Impact on SA objectives

	Sustainability Objectives														
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
Short Term	0	0	+	0	0	+	0	0	0	/	/	+	+	+	+
Medium Term	0	0	+	0	0	+	0	0	0	/	/	+	+	+	+
Long Term	0	0	+	0	0	+	0	0	0	/	/	+	+	+	+

### **Significant Effects**

Policy CS8 is likely to have positive impacts on improving the health of the Districts residents (SO3) through the minimisation of pollution. The policy will positively impact on conserving and enhancing the biological and geological diversity of the environment (SO6).

Braintree contains a largely ancient fieldscape of irregular medieval fields. The policy, in avoiding the loss of the best and most versatile agricultural land, as well as enhancing and managing the natural environment, may have a positive impact on the maintenance of this cultural asset (SO10). However the policy could respond more directly to the heritage value of certain areas of the District's natural environment.

The impacts of this policy on reducing contributions to climatic change (SO11) are uncertain. Whilst not sited within the policy the impact of implementation could provide for green infrastructure, particularly in locations where it will assist in reducing the impacts of climate change by providing flood water storage areas, sustainable drainage systems, urban cooling and local access to shady outdoor space.

There will be positive impacts on water quality (SO12) where measures will be taken to prevent the deterioration in current water quality standards and promote the use of water efficiency measures. There will be positive impacts on reducing the risk of flooding (SO13) resulting from this policy where the Council will minimise exposure of people and property to the risks of flooding through the sequential test and the encouragement of Sustainable Drainage Systems (SUDS). The impacts of this policy on improving air quality (SO14) are likely to be positive. The policy specifies that all development proposals will ensure the protection and enhancement of the natural environment, habitats and biodiversity and geo-diversity of the District from air pollution.

There will be positive impacts on maintaining and enhancing the quality of landscapes (SO15) where new development must mitigate any negative impacts it may have, with regard to the character of the landscape and its sensitivity to change and where development is permitted it will need to enhance the locally distinctive character of the landscape in accordance with the Landscape Character Assessment.

### **Temporal Effects**

It is unlikely that the impacts of the policy will be strengthened over time. The delivery of the Growth locations will increase pressures on the natural environment, however the policy seeks to ensure that any negative impacts are mitigated, resulting in no net gains or losses.



### ***Secondary, Cumulative and Synergistic Effects***

There may be indirect positive synergistic effects on the creation of safe environments and community cohesion (SO1) in conjunction with Policy CS9 through the delivery of public realm improvements incorporating new green infrastructure, however any specific requirements from this are not included within the policy.

There will be indirect positive impacts on the health (SO3) of the District's residents in accumulation with the positive impacts resulting from minimising the exposure of people and property to the risks of flooding.

There may be positive impacts on town centre vitality and viability (SO4) through maximising opportunities for the creation of new green infrastructure and networks in sites allocated for development in synergy with the potential town centre regeneration schemes in Policy CS6. Despite this, development has not been secured for town centre regeneration at this stage and due to this, it is uncertain when any positive impacts will become apparent.

Through maximising opportunities for the creation of new green infrastructure and networks in sites allocated for development and creating green networks to link urban areas to the countryside, there may be positive impacts on promoting walking and cycling (SO7) in synergy with Policy CS9 and CS7.

There are likely to be positive synergistic effects on the quality of townscapes (SO15) in conjunction with Policies CS6 and CS9.

### **5.9.3 Progress through SA process**

Policy CS8 was previously labelled as CS2 in the 'One District – One Vision' consultation document. At that stage the policy was appraised as follows:

'The policy addresses the protection of the natural environment, and supports sustainability objectives especially with regard to quality of life, biodiversity and landscape. The policy could be enhanced to incorporate minimisation of flood risk, surface water run-off and the incorporation of sustainable drainage systems, the extent to which there are impacts on the management of the natural environment will also depend on the detail of other DPDs that should be subject to separate SA/SEA.'

The policy has developed to include specific mention to biodiversity and sustainable drainage systems in the District. The policy has also included broad opportunities/standards as to how the natural environment can be enhanced in the District as a result of the previous appraisal. The supporting text for the Submission Document Policy makes reference to the Habitats Regulation Assessment's forecasted impacts on the Colne and Blackwater Estuaries as a result of a population increase in the District, and the Council states it will assist in funding monitoring surveys on the two estuaries.

### **5.9.4 Alternatives considered**

An alternative policy was considered in the 'One District – One Vision' document to make the Core Planning Policy more or less prescriptive. The reasoning as to why this alternative was not explored further was: "National and regional policies cover many environmental matters and could be felt to be adequate. However the importance of our natural environment and local landscapes, built heritage and the District's desire to lead in sustainable development techniques, suggest that these

matters should be given special local policy support and emphasis – possibly even being more prescriptive about the planning requirements.”

### **5.9.5 Impact on indicators**

The Natural Environment and Biodiversity policy could affect the following SA indicators:

- Condition of SSSIs
- Achievement of EBAP targets
- Water quality
- Access to open space

### **5.9.6 Proposed mitigation measures**

Positive impacts on the sustainability objectives are limited where it is unclear from the policy how enhancements to the natural environment and biodiversity will be delivered, especially through new development. Measures to improve biodiversity and enhance the natural environment could be more specific to development proposals in order to mitigate any negative impacts resulting from them.

The SANG targets highlighted in the supporting text could be included within Core Planning Policy, either within this policy or CS10.

The Policy could respond more directly to the heritage value of certain areas of the District’s natural environment. The policy could also be more specific as to what opportunities there are for new development to improve water quality in all watercourses and waterbodies and have regard to the SFRA in terms of minimising flood risk.

## 5.10CS9: Built and Historic Environment

The Council will promote and secure the highest possible standards of design and layout in all new development and the protection and enhancement of the historic environment, in order to:

- Respect and respond to the local context, especially in the District's historic villages, where development affects the setting of historic or important buildings, conservation areas and areas of highest landscape sensitivity
- Create environments which are safe and accessible to everyone, and which will contribute towards the quality of life in all towns and villages
- Create good quality built environments in commercial and business districts and in the public realm as well as in residential areas
- Secure the maximum viable use of:
  - Renewable energy
  - Recycled and/or energy efficient building materials and design
  - Waste recycling facilities
  - Biodiversity by design materials
- Be capable of meeting the changing future of occupiers, especially in housing developments
- Promote the sympathetic re-use of buildings, particularly where they make a positive contribution to the special character of the local environment, and can contribute to the delivery of sustainable development and regeneration

Renewable energy proposals will be supported where impacts on amenity, wildlife and landscape are acceptable.

### 5.10.1 Justification

The purpose of the policy is to provide the highest possible standards of design in new development across the District.

The policy responds to Planning Policy Statements: PPS1 – Planning and Climate Change (Supplement to PPS1), PPS12 – Local Spatial Planning, PPS22 – Renewable Energy and also Planning Policy Guidance note 15 – Planning and the Historic Environment. Policy CS9 is supported by the Essex Urban Place Supplement and the Essex Design Guide for new development and regeneration to respond to a countywide context and further supported by the Landscape Character Assessment and Landscape Character Settlement Fringe Studies within the Core Strategy Evidence Base for a local context.

## 5.10.2 Impact on SA objectives

	Sustainability Objectives														
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
Short Term	+	+	0	+	0	0	0	/	0	/	+	0	0	0	/
Medium Term	+	+	0	+	0	0	0	/	0	/	+	0	0	0	/
Long Term	+	+	0	+	0	0	0	/	0	/	+	0	0	0	/

### **Significant Effects**

The impact on safety and community cohesion (SO1) are positive in response to the third criterion within policy CS9 which requires safe and accessible environments. The policy states that development will be capable of meeting the changing future of occupiers, especially in housing developments and therefore should be positive in terms of providing decent homes (SO2) however the supporting text does not address what will be delivered and why there is a need in the District.

The creation of a safe and accessible public realm, and pedestrian and cycleways to link town centres with housing growth and employment development will see a positive impact on town centre vitality and viability (SO4).

In securing the maximum use of renewable energy and recycled and/or energy efficient building materials, the District aims to positively contribute to reducing Carbon Dioxide emissions (SO11). Despite this, it is uncertain what will be delivered and at what level due to a lack of requirements and targets for new development.

There is uncertainty with regard to how environments will be accessible (SO8) and the protection of the heritage element of the District's towns and historic centres (SO10), and how new development will respond to it.

This policy will have an uncertain impact on the maintenance and enhancement of townscapes within the District. The policy states that development affects the setting of historic or important buildings, conservation areas and areas of highest landscape sensitivity. This can be read to imply that no development in these areas will be acceptable in order to respect and respond to local context.

The policy will have an uncertain impact on the landscape of the District. It is not clear whether development will (through respecting and responding to local context) or will not be permitted in areas of highest landscape sensitivity. Also, renewable energy proposals will be supported where impacts on the landscape are acceptable. The policy does not specify any criteria on which decisions might be based or regard the Landscape Character Assessment forming part of their evidence base.

### **Temporal Effects**

The impacts of this policy on SO2, SO3, SO4, SO7 and SO8 are likely to become positive in the long term through the delivery of the new proposed Growth Locations.

The impacts of this policy on (SO2) are likely to become positive in the long term through the delivery of the mixed use nature of the new proposed Growth Locations that incorporate a housing element, in synergy with phasing details in Policy CS1 and specific transport projects within Policy CS7.

### ***Secondary, Cumulative and Synergistic Effects***

This policy may have an indirect impact on promoting accessibility (SO8) by providing safe and accessible environments in conjunction with public realm improvements to support the development proposals of the wider Strategy. This can be achieved through the delivery of good standards of design in line with pedestrian and cycle movements as specified in Policy CS7.

#### **5.10.3 Progress through SA process**

Policy CS3 in the 'One District – One Vision' consultation document on The Built Environment was appraised in the SA/SEA for that document. At that stage the policy was appraised as follows:

'The proposed policy positively addresses sustainability objectives. However there is no reference to flood risk, and the management of surface water runoff. Furthermore the policy as worded lacks specificity to Braintree District Council which could be addressed as the policy is refined through the plan preparation process.'

The policy is broadly similar to the corresponding policy in the 'One District – One Vision' document, although has developed to respond to the public realm requirements of the residential, commercial and economic development proposals within the wider Strategy.

#### **5.10.4 Alternatives considered**

Other options for the Built Environment in the 'One District- One Vision' document were an option for the wording of the policy to take account of the regeneration initiatives in the main towns and villages (CS3ALT1) and an option to make the Core Planning Policies more or less prescriptive (CS3ALT2). Alternative CS3ALT2 states that "national and regional policies cover many environmental matters and could be felt to be adequate. However the importance of our natural environment and local landscapes, built heritage and the District's desire to lead in sustainable development techniques, suggest that these matters should be given special local policy support and emphasis – possibly even being more prescriptive about the planning requirements.

This may particularly be the case in areas such as sustainable design and construction where market forces may not address them adequately."

The policy at preferred options stage was deemed to be more positive than the policy emerging from the Draft Submission Document, mainly due to a more comprehensible and direct wording of the policies aims.

All reasonable alternatives have been subject to appraisal in the SA/SEA of the 'One District – One Vision' document. The exploration of including the detailed approach of alternative CS3ALT2 was recommended to respond better to the particular circumstances of Braintree District, with the identification of indicators and targets.

#### **5.10.5 Impact on indicators**

The Built Environment policy could affect the following SA indicators:

- Perception or fear of crime
- Crime rates

- Listed Buildings at Risk Register
- Development on PDL
- Percentage of energy supplied from renewable energy sources
- Waste recycling data
- Incidences of residential flooding

#### **5.10.6 Proposed mitigation measures**

Policy CS9 could have a larger focus on the historic environment in the District, responding more directly to the local circumstances of Braintree District rather than reiterating national policy guidance.

Links should be made between this Policy and Policy CS8 to ensure that flood risk, the requirements of developers, green corridors, features of a biodiversity value, and the integration of SUDS is integrated into consideration of the built environment policy as well as the natural environment.

It is recommended that the policy includes details on how safety features might be implemented, whether in reference to layouts or specific design features that will be required. This is of key importance in light of the proposals within Policy CS7 and the levels of public realm improvements required emanating from proposals in policies CS1 and CS4.

It is recommended that the renewable energy element of this policy responds to the Built Environment surrounding design, particularly in designated areas, and what will be required of development. Where renewable energy proposals will be supported where impacts on the landscape are acceptable, it is recommended that the policy specify any criteria on which such decisions might be based.

The policy implies that new development and the historic value of the built environment is mutually exclusive. In light of this the policy should elaborate on what will be acceptable in order to respect and respond to local context. It is recommended that the policy has a larger focus on the historic environment in the District, responding more directly to local circumstances rather than reiterating national policy guidance.

## 5.11 CS10: Provision for Open Space, Sport and Recreation

The Council will ensure that there is a good provision of high quality and accessible green space, including allotments and publicly accessible natural green space, to meet a wide range of recreation, outdoor sport and amenity needs in the District by:

- Retaining existing sports facilities and green spaces open space used for amenity, recreation or sport unless:
  - They are no longer required to meet the identified needs in the long term (through the Braintree Green Spaces Strategy);
  - Alternative replacement provision of equal or greater community benefit is provided elsewhere as part of the development;
  - Recreation facilities can best be retained and enhanced through development of part of the site;
- Requiring new development to make appropriate provision for publicly accessible green space or improvement of existing accessible green space in accordance with the Council's standards set out in SPD approved by the Council;
- Investigating through future LDDs, the potential to remedy existing deficiencies in provision and quality of green spaces, outdoor sports and children's play facilities in the areas of greatest deficiency in accordance with the Council's adopted standards set out in subsequent DPDs, other Council open space and leisure strategies and other relevant legislation;
- Seeking to maintain, improve and expand the network of green corridors and its links with neighbouring Districts and broaden the range of opportunities for recreational pursuits within the corridors, including the identification of sites of accessible natural greenspace where appropriate.

### 5.11.1 Justification

The purpose of the policy is to provide open space, sport and recreational facilities to support the needs of the District's living, working and visitor population.

The policy is supported by the emerging PPS on Planning for a Natural and Healthy Environment, which will replace PPG17 – Planning for Open Space, Sport and Recreation and paragraph 9.6 of the East of England Plan Revision to 2031. Further support is set out in the Braintree Green Spaces Strategy and the Open Spaces SPD.

### 5.11.2 Impact on SA objectives

	Sustainability Objectives														
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
Short Term	0	0	+	0	0	/	0	+	0	0	0	0	0	0	/
Medium Term	0	0	+	0	0	/	0	+	0	0	0	0	0	0	/
Long Term	0	0	+	0	0	/	0	+	0	0	0	0	0	0	/

### ***Significant Effects***

The impacts of this policy on landscapes and townscales (SO15) on the whole may be positive in line with new provision; despite this it is uncertain what the impacts will be in the short to medium term as new development opportunities are not identified in the strategy and therefore it is unknown what level of new open space provision will be required. In the long term, the development of the Growth locations may have a positive impact on this objective through the provision of new sport and recreational opportunities for new residents, however at a loss of open space that may impact on landscape.

### ***Temporal Effects***

The impacts on providing decent homes (SO2), promoting healthy lifestyles (SO3), and promoting walking and cycling (SO7) are likely to become more positive in the long term with the development of the Growth Locations and more land becoming publicly accessible for the wider population.

### ***Secondary, Cumulative and Synergistic Effects***

Many of the sustainability objectives would be positively impacted upon as a result of the cumulative and synergistic impacts of the Plan Policies being implemented together. Further policies within the plan collectively eliminate those instances of 'no impact' from the implementation of Policy CS1. In brief these are:

- Where Policy CS9 aims to deliver a good quality public realm in developments, there may be positive impacts resulting from Policy CS10 in regards to safety and inclusive access to open space provision.

In addition to these, there are also a number of Policies which result in a cumulative strengthening of the positive effects of CS10. In brief these include:

- The enhancement of biodiversity will be supported through the expansion of green corridors in conjunction with Policy CS8.

#### **5.11.3 Progress through SA process**

Policy CS2 in the 'One District – One Vision' consultation document stated an aim to 'meet the local recreational needs of the community by identifying, protecting, enhancing and managing the natural and informal open spaces across the District'.

The policy has developed into a single policy approach on the requirement for open space, sport and recreation provision focussing on the requirements of paragraph 9.6 of the East of England Plan Revision to 2031 and supporting the District's Open Space SPD.

#### **5.11.4 Alternatives considered**

Another option for open space provision was included in the 'One District – One Vision' document to make the policy more or less prescriptive to address, "special local policy support and emphasis – possibly even being more prescriptive about the planning requirements."



### **5.11.5 Impact on indicators**

The Provision for Open Space, Sport and Recreation policy could affect the following SA indicators:

- Availability of open space/ leisure facilities
- Indices of Multiple Deprivation – Barriers to housing and services domain
- Access to open space
- Residents opinions on the quality and availability of open space
- Population of wild birds

### **5.11.6 Proposed mitigation measures**

There is scope for this policy to be more specific to the District and the development proposals in the Core Strategy, particularly where housing trajectories and the scale of some individual developments are defined elsewhere in the Strategy, and amendments to the Open Space SPD have not been made at this stage.

In regards to the adoption of the Open Space SPD, it is recommended that the policy makes reference to the requirement of provision being within certain distances of housing as per the SPD.

There is the potential for uncertainty through any windfall sites coming forward where existing provision is no longer required to meet identified needs in the long term, however the impacts will be dependant on the type of development proposed and on a site-by-site basis.

It is uncertain how decisions will be made and impacts weighted in regard to the replacement of provision where current provision will not be required in the long term, in light of the restriction of access and usage in order to conserve an areas biodiversity value as specified in Policy CS8.

## 5.12CS11: Infrastructure

The Council will work with partners, service delivery organisations and the development industry, to ensure that the infrastructure services and facilities required to provide for the future needs of the community (including, but not restricted to, transport, health, education, utilities, policing, sport, the arts, and local community facilities) are delivered in a timely, efficient and effective manner.

Provision will be funded by:

- Development contributions through legal agreements, planning obligations, standard charges, or the Community Infrastructure Levy
- The delivery body concerned

The timing of the provision of infrastructure will be set out in Master Plans and legal agreements or planning obligations.

The loss, or significant reduction of, existing services and facilities will be resisted unless:

- there is sufficient evidence that they are no longer viable or needed or
- satisfactory alternatives are available.

### 5.12.1 Justification

The purpose of Policy CS11 is to ensure that new development does not take place without adequate provision of infrastructure.

These aims are supported by Government guidance, and consultations with local infrastructure providers gave information on local constraints. A list of key facilities and infrastructure required to support development up to 2026 is set out within the Core Strategy.

### 5.12.2 Impact on SA objectives

	Sustainability Objectives														
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
Short Term	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Medium Term	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Long Term	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

#### **Significant Effects**

Where the policy specifies the funding of infrastructure, services and facilities provision, there will be no significant effects resulting directly from the policy. As a vehicle to provide infrastructure, services and facilities, the policy's impacts will only be apparent in synergy with the delivery of proposed development coming forward from the individual and combined policies stated within the wider strategy.

### ***Temporal Effects***

Where the policy specifies the funding of infrastructure, services and facilities provision, there will be no direct temporal effects resulting directly from the policy, however benefits will be provided in association with the implementation of growth in accordance with other Policies within the Core Strategy.

### ***Secondary, Cumulative and Synergistic Effects***

Many of the sustainability objectives would be positively impacted upon as a result of the cumulative and synergistic impacts of the Plan Policies being implemented together.

Further policies within the plan collectively eliminate those instances of 'no impact' from the implementation of Policy CS11. In brief these are:

- Positive impacts on the creation of safe environments and social cohesion in synergy with Policy CS9 and the public realm improvements specified in Table 2 -Infrastructure.
- The extension of GP surgeries for the Growth Locations and the creation of a new one at Sible Hedingham to support new housing growth will have a small positive impact on improving the health of the District's residents in synergy with specific development proposals within the plan (as appraised in the 'Strategic Locations' section of this Environmental Report). The provision of open space, sport and recreational facilities further supports this objective; however the impacts on the wider existing population of the District will be minimal, responding to accessibility and public transport improvements throughout the District.
- There will be positive synergistic effects on sustainable levels of prosperity and economic growth with Policy CS4 and the delivery of supporting infrastructure as a result of this policy.
- There may be indirect positive impacts in synergy with SUDS flood prevention/relief measures and open space provision to be provided through developed contributions throughout the District where required.
- There are uncertain impacts on the promotion of sustainable transport choices in the District in synergy with Policy CS7. The delivery of footpath and cycleway provision and public transport improvements throughout the District will have positive impacts. There may be secondary negative impacts on the District's town centres however, through capacity improvements and safety enhancements to the A12 and A120, making private car travel more viable.
- There will be positive impacts on accessibility in synergy with Policy CS7 regarding capacity improvements and safety enhancements to the A12, A120 and improvements to the Braintree Branch Line as specified in Table 2 Infrastructure.
- The provision and expansion of specific primary schools in the District to support new housing development will have a small positive impact on improving the education and skills of the population in synergy with specific development proposals in the 'Strategic Locations' section of this Environmental Report.

- A requirement for the delivery of flood prevention/relief measures and/or SUDS in new development, and the indirect associated impacts on water quality, will positively impact on this objective in synergy with Policy CS8.
- In synergy with Policy CS7, the delivery of public transport and pedestrian and cycleway improvements will impact positively on air quality in the District. These impacts are further supported by improvements to the public realm as specified in the policy and in synergy with Policy CS9.
- There will be positive impacts on the quality of landscapes and townscapes resulting from this policy in synergy with Policies CS6, CS9 and CS10.

In addition to these, there are also a number of Policies which result in a cumulative strengthening of the positive effects of CS11. In brief these include:

- There will be positive impacts on providing everyone with the opportunity to live in a decent home in synergy with Policy CS1 and the secondary cumulative impacts of CS2 (affordable housing delivery), CS4 (the delivery of employment development infrastructure), CS7 (the delivery of transport infrastructure improvements), CS9 (the delivery of public realm improvements) and CS10 (the provision of open space, sport and recreational facilities).
- There will be a secondary positive impact on the District's town centres through the delivery of infrastructure improvements specified in Table 2 Infrastructure, regarding public realm improvements and the transport improvements required for the Growth Locations. There may be secondary negative impacts on the District's town centres however, through capacity improvements and safety enhancements to the A12, A120 and improvements to the Braintree Branch Line, making the town and regional centres of neighbouring District's more accessible.

### **5.12.3 Progress through SA process**

The previous consultation document contained Policy CS9 on infrastructure. At that stage the policy was appraised as follows:

'The proposed approach accords well with the sustainability objectives. However, further assessment of individual sites would be required to ensure that at the site specific level, the policy delivers sustainability objectives.' (p3)

The policy has developed in line with the recommendations made within the detailed appraisal of Policy CS9 within the 'One District – One Vision' document. The policy now specifically includes transport infrastructure requirements in a non exhaustive list. The policy is also supported by a list of key facilities and infrastructure that will be required to support development up to 2026.

### **5.12.4 Alternatives considered**

Other options for developer contributions were not investigated because government guidance requires that LDF's set out the criteria where developer contributions will be sought.

### **5.12.5 Impact on indicators**

Implementation of Policy CS11 is likely to impact on the following SA indicators:

- Availability of open space/ leisure facilities
- Travel to work flows
- Travel to work methods
- Educational achievements
- Indices of multiple deprivation

#### **5.12.6 Proposed mitigation measures**

The capacity of local infrastructure will need to be carefully assessed when looking at proposals, and relevant bodies, such as the Environment Agency, consulted to ensure that proposals can either be carried out without detriment to the environment and capacity of the area or that appropriate mitigation measures are put in place.

The growth proposed is to be phased in accordance with capacity issues, and further details are provided in list of key facilities and infrastructure that will be required to support development up to 2026 is set out within the Core Strategy.

## 6 CONCLUSIONS

### 6.1 Significant Effects

Overall the Core Strategy should have significant positive impacts on providing decent homes (SO2), promoting town centre vitality and viability (SO4) and achieving sustainable levels of prosperity and growth (SO5). The combined long term effect of each Policy within the Core Strategy across the sustainability framework is highlighted in Figure 2 below:

**FIGURE 2: LONG TERM EFFECTS OF THE CORE STRATEGY POLICIES**

	Sustainability Objectives														
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
CS1	+	++	/	+	+	/	/	+	+	/	/	/	/	/	/
CS2	/	++	/	/	0	0	/	/	/	0	0	0	0	/	/
CS3	/	+	+	0	0	0	/	+	+	0	0	+	+	/	0
CS4	+	0	0	+	++	/	/	/	/	/	/	/	/	/	/
CS5	0	0	0	0	+	+	0	0	0	+	0	0	0	0	+
CS6	0	0	0	++	+	/	/	+	0	/	/	0	0	/	/
CS7	0	0	/	0	0	0	+	/	0	0	/	0	0	/	0
CS8	0	0	+	0	0	+	0	0	0	/	/	+	+	+	+
CS9	+	+	0	+	0	0	0	/	0	/	+	0	0	0	/
CS10	0	0	+	0	0	/	0	+	0	0	0	0	0	0	/
CS11	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

There is one objective which does not appear to be particularly well addressed by the provisions made within the document. The maintenance and enhancement of cultural heritage (SO10) is largely uncertain. Whilst there are provisions within Policy CS9, it is unclear as to how the 'protection and enhancement of the historic environment' will be implemented at the District level.

Many of the sustainability objectives would be positively impacted upon as a result of the cumulative and synergistic impacts of the Plan Policies being implemented together.

The combined effects of policies within the plan may collectively eliminate the uncertainty associated with the implementation of other policies. For example the implementation of Policy CS8 in conjunction with CS1 and CS4 may reduce uncertainty with regard to reducing the risk of flooding (SO13) and improving water quality (SO12) by application of the sequential test to all new development and the encouragement of SUDs.

There are also a number of policies which result in a cumulative strengthening of the positive effects of other policies. For example Policy CS1 and the location of the majority of housing development in the Main Towns will further support the positive impacts associated with employment provision identified in Policy CS4.

## 6.2 Monitoring

*SEA Directive requires: A description of the measures envisaged concerning monitoring. Annex I (i)*

The significant sustainability effects of implementing a Local Development Document must be monitored in order to identify unforeseen adverse effects and to be able to undertake appropriate remedial action. Annex C of this Environmental Report contains suggested indicators in order to monitor each of the SA objectives, however these may not all be collected due to limited resources and difficulty in data availability or collection.

Appendix 14 of the 'Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents' guidance (ODPM), provides further details on the implementation and monitoring of LDFs. It states that it is not necessary to monitor everything, but that monitoring should focus on significant sustainability effects, e.g. those that indicate a likely breach of international, national or local legislation, that may give rise to irreversible damage or where there is uncertainty and monitoring would enable preventative or mitigation measures to be taken.

## 6.3 Next Steps

### 6.3.1 Consultation

To enable the community and other stakeholders to continue to contribute to the LDF, there is now a period of formal consultation on the Pre-Submission Core Strategy. This Environmental Report will be published for consultation alongside the Plan, so that it might facilitate more informed responses. It is also important that there is an opportunity for questions to be raised regarding any of the judgements made within this SA/SEA, and further evidence put forward that may help to consider sustainability effects.

Following consultation, the Core Strategy will be submitted to the Government for approval. The approval process involves a public examination held by a Planning Inspector. The Inspector has the power to approve the Document, with or without alteration, or reject it. The Inspector will be able to refer to responses and the recommendations set out in this SA Report, which will be made following this current consultation.

### 6.3.2 SEA Statement

Once a plan or programme has been adopted, the SEA Directive requires those responsible for preparing it, in this case Braintree District Council, to provide the public and the Consultation Bodies with information on how environmental considerations and consultation responses are reflected in the plan or programme and how its implementation will be monitored in the future. The

Directive states that:

*Plan or programme proponents should ensure that, when a plan or programme is adopted, the Environmental Consultation Bodies and the public are informed and the following items are made available to those so informed:*

*(a) the plan or programme as adopted;*

*(b) a statement summarising how environmental considerations have been integrated into the plan or programme...[including] the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with, and*

*(c) the measures decided concerning monitoring [of the plan]*

*Annex 9(1)*

In light of this requirement, Braintree District Council should prepare an SA/SEA Statement setting out the above information (reporting on how sustainability considerations have been taken into account rather than environmental considerations only).



